

WASTE STREAM TECHNOLOGY, INC.

302 Grote Street
Buffalo, NY 14207
(716) 876-5290

Analytical Data Report
Report Date: 05/28/10
Work Order Number: 0E13002

Prepared For
Mark Kamholz
Tonawanda Coke Corporation
3875 River Road
Tonawanda, NY 14150
Fax: (716) 876-4400
Site: Tonawanda Coke - RP1355

Enclosed are the results of analyses for samples received by the laboratory on 05/07/10. If you have any questions concerning this report, please feel free to contact me.

Sincerely,



Brian S. Schepart, Ph.D., Laboratory Director

ENVIRONMENTAL LABORATORY ACCREDITATION CERTIFICATION NUMBERS
NYSDOH ELAP #11179 NJDEPE #73977 PADEP #68757 CTDPH #PH-0306 MADEP #M-NY068



Waste Stream Technology

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Tonawanda Coke Corporation
3875 River Road
Tonawanda NY, 14150

Project: Misc
Project Number: Tonawanda Coke - RP1355
Project Manager: Mark Kamholz

Reported:
05/28/10 15:01

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
CS1A-4F - Water	0E13002-01	Water	05/07/10 10:55	05/07/10 13:52
CS1A-4F - Oil	0E13002-02	Oil	05/07/10 10:55	05/07/10 13:52
CS1A-5F - Water	0E13002-03	Water	05/07/10 10:59	05/07/10 13:52
CS1A-5F - Oil	0E13002-04	Oil	05/07/10 10:59	05/07/10 13:52
CS1A-6F - Water	0E13002-05	Water	05/07/10 11:02	05/07/10 13:52
CS1A-6F - Oil	0E13002-06	Oil	05/07/10 11:02	05/07/10 13:52

Tonawanda Coke Corporation
3875 River Road
Tonawanda NY, 14150

Project: Misc
Project Number: Tonawanda Coke - RP1355
Project Manager: Mark Kamholz

Reported:
05/28/10 15:01

Metals by EPA 6000/7000 Series Methods
Waste Stream Technology

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
CS1A-4F - Water (0E13002-01) Water Sampled: 05/07/10 10:55 Received: 05/07/10 13:52									
Silver	ND	1.00	mg/L	20	AE02003	05/20/10	05/20/10	EPA 6010B	
Arsenic	ND	1.80	"	"	"	"	"	"	
Barium	2.08	1.00	"	"	"	"	"	"	
Beryllium	ND	0.200	"	"	"	"	"	"	
Cadmium	0.327	0.200	"	"	"	"	"	"	
Chromium	ND	1.00	"	"	"	"	"	"	
Mercury	2.905	0.200	"	1000	AE02608	05/26/10	05/26/10	EPA 7470A	
Lead	ND	3.00	"	20	AE02003	05/20/10	05/20/10	EPA 6010B	
Antimony	ND	2.20	"	"	"	"	"	"	
Thallium	ND	1.60	"	"	"	"	"	"	
CS1A-4F - Oil (0E13002-02) Oil Sampled: 05/07/10 10:55 Received: 05/07/10 13:52									
Silver	ND	1.00	mg/kg	1	AE02710	05/27/10	05/28/10	EPA 6010B	
Arsenic	ND	3.40	"	"	"	"	"	"	
Barium	ND	2.00	"	"	"	"	"	"	
Beryllium	ND	1.00	"	"	"	"	"	"	
Cadmium	ND	2.00	"	"	"	"	"	"	
Chromium	ND	2.00	"	"	"	"	"	"	
Mercury	5.08	1.40	"	50	AE02104	05/21/10	05/21/10	EPA 7471A	
Lead	ND	8.20	"	1	AE02710	05/27/10	05/28/10	EPA 6010B	
Antimony	ND	2.80	"	"	"	"	"	"	
Thallium	ND	2.00	"	"	"	"	"	"	
CS1A-5F - Water (0E13002-03) Water Sampled: 05/07/10 10:59 Received: 05/07/10 13:52									
Silver	ND	1.00	mg/L	20	AE02003	05/20/10	05/20/10	EPA 6010B	
Arsenic	ND	1.80	"	"	"	"	"	"	
Barium	1.31	1.00	"	"	"	"	"	"	
Beryllium	ND	0.200	"	"	"	"	"	"	
Cadmium	0.266	0.200	"	"	"	"	"	"	
Chromium	ND	1.00	"	"	"	"	"	"	
Mercury	1.536	0.200	"	1000	AE02608	05/26/10	05/26/10	EPA 7470A	
Lead	ND	3.00	"	20	AE02003	05/20/10	05/20/10	EPA 6010B	
Antimony	ND	2.20	"	"	"	"	"	"	
Thallium	ND	1.60	"	"	"	"	"	"	

Waste Stream Technology

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Tonawanda Coke Corporation
3875 River Road
Tonawanda NY, 14150

Project: Misc
Project Number: Tonawanda Coke - RP1355
Project Manager: Mark Kamholz

Reported:
05/28/10 15:01

Metals by EPA 6000/7000 Series Methods
Waste Stream Technology

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
CS1A-5F - Oil (0E13002-04) Oil Sampled: 05/07/10 10:59 Received: 05/07/10 13:52									
Silver	ND	1.00	mg/kg	1	AE02710	05/27/10	05/28/10	EPA 6010B	
Arsenic	ND	3.40	"	"	"	"	"	"	
Barium	ND	2.00	"	"	"	"	"	"	
Beryllium	ND	1.00	"	"	"	"	"	"	
Cadmium	ND	2.00	"	"	"	"	"	"	
Chromium	ND	2.00	"	"	"	"	"	"	
Mercury	1.69	1.40	"	50	AE02104	05/21/10	05/21/10	EPA 7471A	
Lead	ND	8.20	"	1	AE02710	05/27/10	05/28/10	EPA 6010B	
Antimony	ND	2.80	"	"	"	"	"	"	
Thallium	ND	2.00	"	"	"	"	"	"	
CS1A-6F - Water (0E13002-05) Water Sampled: 05/07/10 11:02 Received: 05/07/10 13:52									
Silver	ND	1.00	mg/L	20	AE02003	05/20/10	05/20/10	EPA 6010B	
Arsenic	ND	1.80	"	"	"	"	"	"	
Barium	2.08	1.00	"	"	"	"	"	"	
Beryllium	ND	0.200	"	"	"	"	"	"	
Cadmium	0.355	0.200	"	"	"	"	"	"	
Chromium	ND	1.00	"	"	"	"	"	"	
Mercury	4.555	0.200	"	1000	AE02608	05/26/10	05/26/10	EPA 7470A	
Lead	ND	3.00	"	20	AE02003	05/20/10	05/20/10	EPA 6010B	
Antimony	ND	2.20	"	"	"	"	"	"	
Thallium	ND	1.60	"	"	"	"	"	"	
CS1A-6F - Oil (0E13002-06) Oil Sampled: 05/07/10 11:02 Received: 05/07/10 13:52									
Silver	ND	1.00	mg/kg	1	AE02710	05/27/10	05/28/10	EPA 6010B	
Arsenic	ND	3.40	"	"	"	"	"	"	
Barium	ND	2.00	"	"	"	"	"	"	
Beryllium	ND	1.00	"	"	"	"	"	"	
Cadmium	ND	2.00	"	"	"	"	"	"	
Chromium	ND	2.00	"	"	"	"	"	"	
Mercury	2.83	1.40	"	50	AE02104	05/21/10	05/21/10	EPA 7471A	
Lead	ND	8.20	"	1	AE02710	05/27/10	05/28/10	EPA 6010B	
Antimony	ND	2.80	"	"	"	"	"	"	
Thallium	ND	2.00	"	"	"	"	"	"	

Waste Stream Technology

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Tonawanda Coke Corporation
3875 River Road
Tonawanda NY, 14150

Project: Misc
Project Number: Tonawanda Coke - RP1355
Project Manager: Mark Kamholz

Reported:
05/28/10 15:01

Polychlorinated Biphenyls by EPA Method 8082

Waste Stream Technology

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
CS1A-4F - Water (0E13002-01) Water Sampled: 05/07/10 10:55 Received: 05/07/10 13:52									
Aroclor 1016	ND	10.0	ug/l	10	AE01409	05/14/10	05/18/10	8082	U
Aroclor 1221	ND	10.0	"	"	"	"	"	"	U
Aroclor 1232	ND	10.0	"	"	"	"	"	"	U
Aroclor 1242	ND	10.0	"	"	"	"	"	"	U
Aroclor 1248	ND	10.0	"	"	"	"	"	"	U
Aroclor 1254	ND	10.0	"	"	"	"	"	"	U
Aroclor 1260	ND	10.0	"	"	"	"	"	"	U
Aroclor 1262	ND	10.0	"	"	"	"	"	"	U
Aroclor 1268	ND	10.0	"	"	"	"	"	"	U
Surrogate: Tetrachloro-meta-xylene		40.6 %	51-137		"	"	"	"	S-04
Surrogate: Decachlorobiphenyl		4.96 %	29-125		"	"	"	"	S-04
CS1A-4F - Oil (0E13002-02) Oil Sampled: 05/07/10 10:55 Received: 05/07/10 13:52									
Aroclor 1016	ND	1.0	mg/kg	5	AE01808	05/18/10	05/18/10	8082	U
Aroclor 1221	ND	1.0	"	"	"	"	"	"	U
Aroclor 1232	ND	1.0	"	"	"	"	"	"	U
Aroclor 1242	ND	1.0	"	"	"	"	"	"	U
Aroclor 1248	ND	1.0	"	"	"	"	"	"	U
Aroclor 1254	ND	1.0	"	"	"	"	"	"	U
Aroclor 1260	ND	1.0	"	"	"	"	"	"	U
Aroclor 1262	ND	1.0	"	"	"	"	"	"	U
Aroclor 1268	ND	1.0	"	"	"	"	"	"	U
Surrogate: Tetrachloro-meta-xylene		102 %	60-138		"	"	"	"	
Surrogate: Decachlorobiphenyl		129 %	64-130		"	"	"	"	

Waste Stream Technology

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Tonawanda Coke Corporation
3875 River Road
Tonawanda NY, 14150

Project: Misc
Project Number: Tonawanda Coke - RP1355
Project Manager: Mark Kamholz

Reported:
05/28/10 15:01

Polychlorinated Biphenyls by EPA Method 8082
Waste Stream Technology

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
CS1A-5F - Water (0E13002-03) Water Sampled: 05/07/10 10:59 Received: 05/07/10 13:52									
Aroclor 1016	ND	5.00	ug/l	5	AE01409	05/14/10	05/18/10	8082	U
Aroclor 1221	ND	5.00	"	"	"	"	"	"	U
Aroclor 1232	ND	5.00	"	"	"	"	"	"	U
Aroclor 1242	ND	5.00	"	"	"	"	"	"	U
Aroclor 1248	ND	5.00	"	"	"	"	"	"	U
Aroclor 1254	ND	5.00	"	"	"	"	"	"	U
Aroclor 1260	ND	5.00	"	"	"	"	"	"	U
Aroclor 1262	ND	5.00	"	"	"	"	"	"	U
Aroclor 1268	ND	5.00	"	"	"	"	"	"	U
Surrogate: Tetrachloro-meta-xylene		31.5 %	51-137		"	"	"	"	S-04
Surrogate: Decachlorobiphenyl		7.86 %	29-125		"	"	"	"	S-04
CS1A-5F - Oil (0E13002-04) Oil Sampled: 05/07/10 10:59 Received: 05/07/10 13:52									
Aroclor 1016	ND	1.0	mg/kg	5	AE01808	05/18/10	05/18/10	8082	U
Aroclor 1221	ND	1.0	"	"	"	"	"	"	U
Aroclor 1232	ND	1.0	"	"	"	"	"	"	U
Aroclor 1242	ND	1.0	"	"	"	"	"	"	U
Aroclor 1248	ND	1.0	"	"	"	"	"	"	U
Aroclor 1254	ND	1.0	"	"	"	"	"	"	U
Aroclor 1260	ND	1.0	"	"	"	"	"	"	U
Aroclor 1262	ND	1.0	"	"	"	"	"	"	U
Aroclor 1268	ND	1.0	"	"	"	"	"	"	U
Surrogate: Tetrachloro-meta-xylene		102 %	60-138		"	"	"	"	
Surrogate: Decachlorobiphenyl		128 %	64-130		"	"	"	"	

Waste Stream Technology

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Tonawanda Coke Corporation
3875 River Road
Tonawanda NY, 14150

Project: Misc
Project Number: Tonawanda Coke - RP1355
Project Manager: Mark Kamholz

Reported:
05/28/10 15:01

Polychlorinated Biphenyls by EPA Method 8082

Waste Stream Technology

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
CS1A-6F - Water (0E13002-05) Water Sampled: 05/07/10 11:02 Received: 05/07/10 13:52									
Aroclor 1016	ND	5.00	ug/l	5	AE01409	05/14/10	05/18/10	8082	U
Aroclor 1221	ND	5.00	"	"	"	"	"	"	U
Aroclor 1232	ND	5.00	"	"	"	"	"	"	U
Aroclor 1242	ND	5.00	"	"	"	"	"	"	U
Aroclor 1248	ND	5.00	"	"	"	"	"	"	U
Aroclor 1254	ND	5.00	"	"	"	"	"	"	U
Aroclor 1260	ND	5.00	"	"	"	"	"	"	U
Aroclor 1262	ND	5.00	"	"	"	"	"	"	U
Aroclor 1268	ND	5.00	"	"	"	"	"	"	U
Surrogate: Tetrachloro-meta-xylene		27.8 %	51-137	"	"	"	"	"	S-04
Surrogate: Decachlorobiphenyl		0.889 %	29-125	"	"	"	"	"	S-04
CS1A-6F - Oil (0E13002-06) Oil Sampled: 05/07/10 11:02 Received: 05/07/10 13:52									
Aroclor 1016	ND	1.0	mg/kg	5	AE01808	05/18/10	05/18/10	8082	U
Aroclor 1221	ND	1.0	"	"	"	"	"	"	U
Aroclor 1232	ND	1.0	"	"	"	"	"	"	U
Aroclor 1242	ND	1.0	"	"	"	"	"	"	U
Aroclor 1248	ND	1.0	"	"	"	"	"	"	U
Aroclor 1254	ND	1.0	"	"	"	"	"	"	U
Aroclor 1260	ND	1.0	"	"	"	"	"	"	U
Aroclor 1262	ND	1.0	"	"	"	"	"	"	U
Aroclor 1268	ND	1.0	"	"	"	"	"	"	U
Surrogate: Tetrachloro-meta-xylene		97.6 %	60-138	"	"	"	"	"	
Surrogate: Decachlorobiphenyl		117 %	64-130	"	"	"	"	"	

Waste Stream Technology

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Tonawanda Coke Corporation
3875 River Road
Tonawanda NY, 14150

Project: Misc
Project Number: Tonawanda Coke - RP1355
Project Manager: Mark Kamholz

Reported:
05/28/10 15:01

Volatile Organic Compounds by EPA Method 8260B
Waste Stream Technology

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
CS1A-4F - Water (0E13002-01) Water Sampled: 05/07/10 10:55 Received: 05/07/10 13:52									
dichlorodifluoromethane	ND	10000	ug/l	1	AE01701	05/17/10	05/17/10	8260	U
chloromethane	ND	10000	"	"	"	"	"	"	U
vinyl chloride	ND	10000	"	"	"	"	"	"	U
bromomethane	ND	10000	"	"	"	"	"	"	U
chloroethane	ND	10000	"	"	"	"	"	"	U
trichlorofluoromethane	ND	10000	"	"	"	"	"	"	U
1,1-dichloroethene	ND	5000	"	"	"	"	"	"	U
acetone	82000	50000	"	"	"	"	"	"	
carbon disulfide	ND	5000	"	"	"	"	"	"	U
methylene chloride	ND	10000	"	"	"	"	"	"	U
Methyl tert-butyl ether	ND	5000	"	"	"	"	"	"	U
Acrylonitrile	ND	50000	"	"	"	"	"	"	U
trans-1,2-dichloroethene	ND	5000	"	"	"	"	"	"	U
1,1-dichloroethane	ND	5000	"	"	"	"	"	"	U
vinyl acetate	ND	50000	"	"	"	"	"	"	U
2-butanone	ND	50000	"	"	"	"	"	"	U
2,2-dichloropropane	ND	5000	"	"	"	"	"	"	U
cis-1,2-dichloroethene	ND	5000	"	"	"	"	"	"	U
chloroform	ND	5000	"	"	"	"	"	"	U
bromochloromethane	ND	5000	"	"	"	"	"	"	U
1,1,1-trichloroethane	ND	5000	"	"	"	"	"	"	U
carbon tetrachloride	ND	5000	"	"	"	"	"	"	U
1,1-dichloropropene	ND	5000	"	"	"	"	"	"	U
benzene	72400	5000	"	"	"	"	"	"	
1,2-dichloroethane	ND	5000	"	"	"	"	"	"	U
trichloroethene	ND	5000	"	"	"	"	"	"	U
1,2-dichloropropane	ND	5000	"	"	"	"	"	"	U
bromodichloromethane	ND	5000	"	"	"	"	"	"	U
2-chloroethylvinyl ether	ND	50000	"	"	"	"	"	"	U
4-Methyl-2-pentanone (MIBK)	ND	50000	"	"	"	"	"	"	U
cis-1,3-dichloropropene	ND	5000	"	"	"	"	"	"	U
toluene	37000	5000	"	"	"	"	"	"	
trans-1,3-dichloropropene	ND	5000	"	"	"	"	"	"	U
1,1,2-trichloroethane	ND	5000	"	"	"	"	"	"	U
2-hexanone	ND	50000	"	"	"	"	"	"	U
tetrachloroethene	ND	5000	"	"	"	"	"	"	U
1,3-dichloropropane	ND	5000	"	"	"	"	"	"	U
dibromochloromethane	ND	5000	"	"	"	"	"	"	U
1,2-dibromoethane	ND	5000	"	"	"	"	"	"	U
1-chlorohexane	ND	5000	"	"	"	"	"	"	U
chlorobenzene	ND	5000	"	"	"	"	"	"	U
1,1,1,2-tetrachloroethane	ND	5000	"	"	"	"	"	"	U

Waste Stream Technology

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Tonawanda Coke Corporation
3875 River Road
Tonawanda NY, 14150

Project: Misc
Project Number: Tonawanda Coke - RP1355
Project Manager: Mark Kamholz

Reported:
05/28/10 15:01

Volatile Organic Compounds by EPA Method 8260B
Waste Stream Technology

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
CS1A-4F - Water (0E13002-01) Water Sampled: 05/07/10 10:55 Received: 05/07/10 13:52									
ethylbenzene	7450	5000	ug/l	1	AE01701	05/17/10	05/17/10	8260	
m,p-xylene	16600	10000	"	"	"	"	"	"	
o-xylene	20800	5000	"	"	"	"	"	"	
styrene	8150	5000	"	"	"	"	"	"	
bromoform	ND	5000	"	"	"	"	"	"	U
isopropylbenzene	15200	5000	"	"	"	"	"	"	
1,1,2,2-tetrachloroethane	ND	5000	"	"	"	"	"	"	U
bromobenzene	ND	5000	"	"	"	"	"	"	U
1,2,3-trichloropropane	ND	5000	"	"	"	"	"	"	U
n-propylbenzene	13400	5000	"	"	"	"	"	"	
2-chlorotoluene	ND	5000	"	"	"	"	"	"	U
1,3,5-trimethylbenzene	18600	5000	"	"	"	"	"	"	
4-chlorotoluene	ND	5000	"	"	"	"	"	"	U
tert-butylbenzene	ND	5000	"	"	"	"	"	"	U
1,2,4-trimethylbenzene	56200	5000	"	"	"	"	"	"	
sec-butylbenzene	ND	5000	"	"	"	"	"	"	U
p-isopropyltoluene	ND	5000	"	"	"	"	"	"	U
1,3-dichlorobenzene	ND	5000	"	"	"	"	"	"	U
1,4-dichlorobenzene	ND	5000	"	"	"	"	"	"	U
n-butylbenzene	ND	5000	"	"	"	"	"	"	U
1,2-dichlorobenzene	ND	5000	"	"	"	"	"	"	U
1,2-dibromo-3-chloropropane	ND	50000	"	"	"	"	"	"	U
1,2,4-trichlorobenzene	ND	5000	"	"	"	"	"	"	U
hexachlorobutadiene	ND	5000	"	"	"	"	"	"	U
naphthalene	596000	5000	"	"	"	"	"	"	
1,2,3-trichlorobenzene	ND	5000	"	"	"	"	"	"	U
1,1,2-trichloro-1,2,2-trifluoroethane	ND	5000	"	"	"	"	"	"	U
Surrogate: Dibromofluoromethane		97.0 %	85-110		"	"	"	"	
Surrogate: 1,2-Dichloroethane-d4		101 %	80-113		"	"	"	"	
Surrogate: Toluene-d8		101 %	86-111		"	"	"	"	
Surrogate: Bromofluorobenzene		102 %	85-116		"	"	"	"	

Waste Stream Technology

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Tonawanda Coke Corporation
3875 River Road
Tonawanda NY, 14150

Project: Misc
Project Number: Tonawanda Coke - RP1355
Project Manager: Mark Kamholz

Reported:
05/28/10 15:01

Volatile Organic Compounds by EPA Method 8260B
Waste Stream Technology

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
CS1A-4F - Oil (0E13002-02) Oil Sampled: 05/07/10 10:55 Received: 05/07/10 13:52									
dichlorodifluoromethane	ND	500000	ug/kg	100	AE01801	05/18/10	05/18/10	8260	U
chloromethane	ND	500000	"	"	"	"	"	"	U
vinyl chloride	ND	500000	"	"	"	"	"	"	U
bromomethane	ND	500000	"	"	"	"	"	"	U
chloroethane	ND	500000	"	"	"	"	"	"	U
trichlorofluoromethane	ND	500000	"	"	"	"	"	"	U
1,1-dichloroethene	ND	100000	"	"	"	"	"	"	U
acetone	ND	500000	"	"	"	"	"	"	U
carbon disulfide	ND	100000	"	"	"	"	"	"	U
methylene chloride	184000	100000	"	"	"	"	"	"	B
Methyl tert-butyl ether	ND	100000	"	"	"	"	"	"	U
trans-1,2-dichloroethene	ND	100000	"	"	"	"	"	"	U
1,1-dichloroethane	ND	100000	"	"	"	"	"	"	U
vinyl acetate	ND	500000	"	"	"	"	"	"	U
2-butanone	ND	500000	"	"	"	"	"	"	U
2,2-dichloropropane	ND	100000	"	"	"	"	"	"	U
cis-1,2-dichloroethene	ND	100000	"	"	"	"	"	"	U
chloroform	ND	100000	"	"	"	"	"	"	U
bromochloromethane	ND	100000	"	"	"	"	"	"	U
1,1,1-trichloroethane	ND	100000	"	"	"	"	"	"	U
carbon tetrachloride	ND	100000	"	"	"	"	"	"	U
1,1-dichloropropene	ND	100000	"	"	"	"	"	"	U
benzene	1050000	100000	"	"	"	"	"	"	U
1,2-dichloroethane	ND	100000	"	"	"	"	"	"	U
trichloroethene	ND	100000	"	"	"	"	"	"	U
1,2-dichloropropane	ND	100000	"	"	"	"	"	"	U
bromodichloromethane	ND	100000	"	"	"	"	"	"	U
4-Methyl-2-pentanone (MIBK)	ND	500000	"	"	"	"	"	"	U
cis-1,3-dichloropropene	ND	100000	"	"	"	"	"	"	U
toluene	606000	100000	"	"	"	"	"	"	U
trans-1,3-dichloropropene	ND	100000	"	"	"	"	"	"	U
1,1,2-trichloroethane	ND	100000	"	"	"	"	"	"	U
2-hexanone	ND	500000	"	"	"	"	"	"	U
tetrachloroethene	ND	100000	"	"	"	"	"	"	U
1,3-dichloropropane	ND	100000	"	"	"	"	"	"	U
dibromochloromethane	ND	100000	"	"	"	"	"	"	U
1,2-dibromoethane	ND	100000	"	"	"	"	"	"	U
1-chlorohexane	ND	100000	"	"	"	"	"	"	U
chlorobenzene	ND	100000	"	"	"	"	"	"	U
1,1,1,2-tetrachloroethane	ND	100000	"	"	"	"	"	"	U
ethylbenzene	134000	100000	"	"	"	"	"	"	U
m,p-xylene	297000	200000	"	"	"	"	"	"	U

Waste Stream Technology

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Tonawanda Coke Corporation
3875 River Road
Tonawanda NY, 14150

Project: Misc
Project Number: Tonawanda Coke - RP1355
Project Manager: Mark Kamholz

Reported:
05/28/10 15:01

Volatile Organic Compounds by EPA Method 8260B
Waste Stream Technology

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
CS1A-4F - Oil (0E13002-02) Oil Sampled: 05/07/10 10:55 Received: 05/07/10 13:52									
o-xylene	378000	100000	ug/kg	100	AF01801	05/18/10	05/18/10	8260	
styrene	122000	100000	"	"	"	"	"	"	
bromoform	ND	100000	"	"	"	"	"	"	U
isopropylbenzene	264000	100000	"	"	"	"	"	"	
1,1,2,2-tetrachloroethane	ND	100000	"	"	"	"	"	"	U
bromobenzene	ND	100000	"	"	"	"	"	"	U
1,2,3-trichloropropane	ND	100000	"	"	"	"	"	"	U
n-propylbenzene	250000	100000	"	"	"	"	"	"	
2-chlorotoluene	ND	100000	"	"	"	"	"	"	U
1,3,5-trimethylbenzene	333000	100000	"	"	"	"	"	"	
4-chlorotoluene	ND	100000	"	"	"	"	"	"	U
tert-butylbenzene	ND	100000	"	"	"	"	"	"	U
1,2,4-trimethylbenzene	1020000	100000	"	"	"	"	"	"	
sec-butylbenzene	ND	100000	"	"	"	"	"	"	U
p-isopropyltoluene	ND	100000	"	"	"	"	"	"	U
1,3-dichlorobenzene	ND	100000	"	"	"	"	"	"	U
1,4-dichlorobenzene	ND	100000	"	"	"	"	"	"	U
n-butylbenzene	ND	100000	"	"	"	"	"	"	U
1,2-dichlorobenzene	ND	100000	"	"	"	"	"	"	U
1,2-dibromo-3-chloropropane	ND	500000	"	"	"	"	"	"	U
1,2,4-trichlorobenzene	ND	100000	"	"	"	"	"	"	U
hexachlorobutadiene	ND	100000	"	"	"	"	"	"	U
naphthalene	5630000	100000	"	"	"	"	"	"	
1,2,3-trichlorobenzene	ND	100000	"	"	"	"	"	"	U
1,1,2-trichloro-1,2,2-trifluoroethane	ND	100000	"	"	"	"	"	"	U
Surrogate: 1,2-Dichloroethane-d4		%	79-118		"	"	"	"	S-01, U
Surrogate: Dibromofluoromethane		%	78-115		"	"	"	"	S-01, U
Surrogate: Toluene-d8		%	84-110		"	"	"	"	S-01, U
Surrogate: Bromofluorobenzene		%	81-118		"	"	"	"	S-01, U

Waste Stream Technology

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Tonawanda Coke Corporation
3875 River Road
Tonawanda NY, 14150

Project: Misc
Project Number: Tonawanda Coke - RP1355
Project Manager: Mark Kamholz

Reported:
05/28/10 15:01

Volatile Organic Compounds by EPA Method 8260B
Waste Stream Technology

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
CS1A-5F - Water (0E13002-03) Water Sampled: 05/07/10 10:59 Received: 05/07/10 13:52									
dichlorodifluoromethane	ND	10000	ug/l	1	AE01701	05/17/10	05/17/10	8260	U
chloromethane	ND	10000	"	"	"	"	"	"	U
vinyl chloride	ND	10000	"	"	"	"	"	"	U
bromomethane	ND	10000	"	"	"	"	"	"	U
chloroethane	ND	10000	"	"	"	"	"	"	U
trichlorofluoromethane	ND	10000	"	"	"	"	"	"	U
1,1-dichloroethene	ND	5000	"	"	"	"	"	"	U
acetone	87200	50000	"	"	"	"	"	"	
carbon disulfide	ND	5000	"	"	"	"	"	"	U
methylene chloride	10300	10000	"	"	"	"	"	"	
Methyl tert-butyl ether	ND	5000	"	"	"	"	"	"	U
Acrylonitrile	ND	50000	"	"	"	"	"	"	U
trans-1,2-dichloroethene	ND	5000	"	"	"	"	"	"	U
1,1-dichloroethane	ND	5000	"	"	"	"	"	"	U
vinyl acetate	ND	50000	"	"	"	"	"	"	U
2-butanone	ND	50000	"	"	"	"	"	"	U
2,2-dichloropropane	ND	5000	"	"	"	"	"	"	U
cis-1,2-dichloroethene	ND	5000	"	"	"	"	"	"	U
chloroform	ND	5000	"	"	"	"	"	"	U
bromochloromethane	ND	5000	"	"	"	"	"	"	U
1,1,1-trichloroethane	ND	5000	"	"	"	"	"	"	U
carbon tetrachloride	ND	5000	"	"	"	"	"	"	U
1,1-dichloropropene	ND	5000	"	"	"	"	"	"	U
benzene	76400	5000	"	"	"	"	"	"	
1,2-dichloroethane	ND	5000	"	"	"	"	"	"	U
trichloroethene	ND	5000	"	"	"	"	"	"	U
1,2-dichloropropane	ND	5000	"	"	"	"	"	"	U
bromodichloromethane	ND	5000	"	"	"	"	"	"	U
2-chloroethylvinyl ether	ND	50000	"	"	"	"	"	"	U
4-Methyl-2-pentanone (MIBK)	ND	50000	"	"	"	"	"	"	U
cis-1,3-dichloropropene	ND	5000	"	"	"	"	"	"	U
toluene	38000	5000	"	"	"	"	"	"	
trans-1,3-dichloropropene	ND	5000	"	"	"	"	"	"	U
1,1,2-trichloroethane	ND	5000	"	"	"	"	"	"	U
2-hexanone	ND	50000	"	"	"	"	"	"	U
tetrachloroethene	ND	5000	"	"	"	"	"	"	U
1,3-dichloropropane	ND	5000	"	"	"	"	"	"	U
dibromochloromethane	ND	5000	"	"	"	"	"	"	U
1,2-dibromoethane	ND	5000	"	"	"	"	"	"	U
1-chlorohexane	ND	5000	"	"	"	"	"	"	U
chlorobenzene	ND	5000	"	"	"	"	"	"	U
1,1,1,2-tetrachloroethane	ND	5000	"	"	"	"	"	"	U

Waste Stream Technology

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety

Tonawanda Coke Corporation
3875 River Road
Tonawanda NY, 14150

Project: Misc
Project Number: Tonawanda Coke - RP1355
Project Manager: Mark Kamholz

Reported:
05/28/10 15:01

Volatile Organic Compounds by EPA Method 8260B
Waste Stream Technology

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
CS1A-5F - Water (0E13002-03) Water Sampled: 05/07/10 10:59 Received: 05/07/10 13:52									
ethylbenzene	7650	5000	ug/l	1	AE01701	05/17/10	05/17/10	8260	
m,p-xylene	17600	10000	"	"	"	"	"	"	
o-xylene	21400	5000	"	"	"	"	"	"	
styrene	8300	5000	"	"	"	"	"	"	
bromoform	ND	5000	"	"	"	"	"	"	U
isopropylbenzene	15200	5000	"	"	"	"	"	"	
1,1,2,2-tetrachloroethane	ND	5000	"	"	"	"	"	"	U
bromobenzene	ND	5000	"	"	"	"	"	"	U
1,2,3-trichloropropane	ND	5000	"	"	"	"	"	"	U
n-propylbenzene	14000	5000	"	"	"	"	"	"	
2-chlorotoluene	ND	5000	"	"	"	"	"	"	U
1,3,5-trimethylbenzene	19400	5000	"	"	"	"	"	"	
4-chlorotoluene	ND	5000	"	"	"	"	"	"	U
tert-butylbenzene	ND	5000	"	"	"	"	"	"	U
1,2,4-trimethylbenzene	58200	5000	"	"	"	"	"	"	
sec-butylbenzene	ND	5000	"	"	"	"	"	"	U
p-isopropyltoluene	ND	5000	"	"	"	"	"	"	U
1,3-dichlorobenzene	ND	5000	"	"	"	"	"	"	U
1,4-dichlorobenzene	ND	5000	"	"	"	"	"	"	U
n-butylbenzene	ND	5000	"	"	"	"	"	"	U
1,2-dichlorobenzene	ND	5000	"	"	"	"	"	"	U
1,2-dibromo-3-chloropropane	ND	50000	"	"	"	"	"	"	U
1,2,4-trichlorobenzene	ND	5000	"	"	"	"	"	"	U
hexachlorobutadiene	ND	5000	"	"	"	"	"	"	U
naphthalene	545000	5000	"	"	"	"	"	"	
1,2,3-trichlorobenzene	ND	5000	"	"	"	"	"	"	U
1,1,2-trichloro-1,2,2-trifluoroethane	ND	5000	"	"	"	"	"	"	U
Surrogate: Dibromofluoromethane	99.6 %	85-110			"	"	"	"	
Surrogate: 1,2-Dichloroethane-d4	104 %	80-113			"	"	"	"	
Surrogate: Toluene-d8	100 %	86-111			"	"	"	"	
Surrogate: Bromofluorobenzene	104 %	85-116			"	"	"	"	

Waste Stream Technology

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Tonawanda Coke Corporation
3875 River Road
Tonawanda NY, 14150

Project: Misc
Project Number: Tonawanda Coke - RP1355
Project Manager: Mark Kamholz

Reported:
05/28/10 15:01

Volatile Organic Compounds by EPA Method 8260B
Waste Stream Technology

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
CSIA-5F - Oil (0E13002-04) Oil Sampled: 05/07/10 10:59 Received: 05/07/10 13:52									
dichlorodifluoromethane	ND	495000	ug/kg	100	AE01801	05/18/10	05/18/10	8260	U
chloromethane	ND	495000	"	"	"	"	"	"	U
vinyl chloride	ND	495000	"	"	"	"	"	"	U
bromomethane	ND	495000	"	"	"	"	"	"	U
chloroethane	ND	495000	"	"	"	"	"	"	U
trichlorofluoromethane	ND	495000	"	"	"	"	"	"	U
1,1-dichloroethene	ND	99000	"	"	"	"	"	"	U
acetone	ND	495000	"	"	"	"	"	"	U
carbon disulfide	ND	99000	"	"	"	"	"	"	U
methylene chloride	336000	99000	"	"	"	"	"	"	B
Methyl tert-butyl ether	ND	99000	"	"	"	"	"	"	U
trans-1,2-dichloroethene	ND	99000	"	"	"	"	"	"	U
1,1-dichloroethane	ND	99000	"	"	"	"	"	"	U
vinyl acetate	ND	495000	"	"	"	"	"	"	U
2-butanone	ND	495000	"	"	"	"	"	"	U
2,2-dichloropropane	ND	99000	"	"	"	"	"	"	U
cis-1,2-dichloroethene	ND	99000	"	"	"	"	"	"	U
chloroform	ND	99000	"	"	"	"	"	"	U
bromochloromethane	ND	99000	"	"	"	"	"	"	U
1,1,1-trichloroethane	ND	99000	"	"	"	"	"	"	U
carbon tetrachloride	ND	99000	"	"	"	"	"	"	U
1,1-dichloropropene	ND	99000	"	"	"	"	"	"	U
benzene	1100000	99000	"	"	"	"	"	"	
1,2-dichloroethane	ND	99000	"	"	"	"	"	"	U
trichloroethene	ND	99000	"	"	"	"	"	"	U
1,2-dichloropropane	ND	99000	"	"	"	"	"	"	U
bromodichloromethane	ND	99000	"	"	"	"	"	"	U
4-Methyl-2-pentanone (MIBK)	ND	495000	"	"	"	"	"	"	U
cis-1,3-dichloropropene	ND	99000	"	"	"	"	"	"	U
toluene	630000	99000	"	"	"	"	"	"	
trans-1,3-dichloropropene	ND	99000	"	"	"	"	"	"	U
1,1,2-trichloroethane	ND	99000	"	"	"	"	"	"	U
2-hexanone	ND	495000	"	"	"	"	"	"	U
tetrachloroethene	ND	99000	"	"	"	"	"	"	U
1,3-dichloropropane	ND	99000	"	"	"	"	"	"	U
dibromochloromethane	ND	99000	"	"	"	"	"	"	U
1,2-dibromoethane	ND	99000	"	"	"	"	"	"	U
1-chlorohexane	ND	99000	"	"	"	"	"	"	U
chlorobenzene	ND	99000	"	"	"	"	"	"	U
1,1,1,2-tetrachloroethane	ND	99000	"	"	"	"	"	"	U
ethylbenzene	141000	99000	"	"	"	"	"	"	
m,p-xylene	331000	198000	"	"	"	"	"	"	

Waste Stream Technology

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Tonawanda Coke Corporation
3875 River Road
Tonawanda NY, 14150

Project: Misc
Project Number: Tonawanda Coke - RP1355
Project Manager: Mark Kamholz

Reported:
05/28/10 15:01

Volatile Organic Compounds by EPA Method 8260B
Waste Stream Technology

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
CS1A-5F - Oil (0E13002-04) Oil Sampled: 05/07/10 10:59 Received: 05/07/10 13:52									
o-xylene	384000	99000	ug/kg	100	AE01801	05/18/10	05/18/10	8260	
styrene	129000	99000	"	"	"	"	"	"	
bromoform	ND	99000	"	"	"	"	"	"	U
isopropylbenzene	268000	99000	"	"	"	"	"	"	
1,1,2,2-tetrachloroethane	ND	99000	"	"	"	"	"	"	U
bromobenzene	ND	99000	"	"	"	"	"	"	U
1,2,3-trichloropropane	ND	99000	"	"	"	"	"	"	U
n-propylbenzene	257000	99000	"	"	"	"	"	"	
2-chlorotoluene	ND	99000	"	"	"	"	"	"	U
1,3,5-trimethylbenzene	342000	99000	"	"	"	"	"	"	
4-chlorotoluene	ND	99000	"	"	"	"	"	"	U
tert-butylbenzene	ND	99000	"	"	"	"	"	"	U
1,2,4-trimethylbenzene	963000	99000	"	"	"	"	"	"	
sec-butylbenzene	ND	99000	"	"	"	"	"	"	U
p-isopropyltoluene	ND	99000	"	"	"	"	"	"	U
1,3-dichlorobenzene	ND	99000	"	"	"	"	"	"	U
1,4-dichlorobenzene	ND	99000	"	"	"	"	"	"	U
n-butylbenzene	ND	99000	"	"	"	"	"	"	U
1,2-dichlorobenzene	ND	99000	"	"	"	"	"	"	U
1,2-dibromo-3-chloropropane	ND	495000	"	"	"	"	"	"	U
1,2,4-trichlorobenzene	ND	99000	"	"	"	"	"	"	U
hexachlorobutadiene	ND	99000	"	"	"	"	"	"	U
naphthalene	5880000	99000	"	"	"	"	"	"	
1,2,3-trichlorobenzene	ND	99000	"	"	"	"	"	"	U
1,1,2-trichloro-1,2,2-trifluoroethane	ND	99000	"	"	"	"	"	"	U
Surrogate: Dibromofluoromethane	%		78-115		"	"	"	"	S-01, U
Surrogate: 1,2-Dichloroethane-d4	%		79-118		"	"	"	"	S-01, U
Surrogate: Toluene-d8	%		84-110		"	"	"	"	S-01, U
Surrogate: Bromofluorobenzene	%		81-118		"	"	"	"	S-01, U

Waste Stream Technology

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Tonawanda Coke Corporation
3875 River Road
Tonawanda NY, 14150

Project: Misc
Project Number: Tonawanda Coke - RP1355
Project Manager: Mark Kamholz

Reported:
05/28/10 15:01

Volatile Organic Compounds by EPA Method 8260B
Waste Stream Technology

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
CSIA-6F - Water (0E13002-05) Water Sampled: 05/07/10 11:02 Received: 05/07/10 13:52									
dichlorodifluoromethane	ND	10000	ug/l	1	AE01701	05/17/10	05/17/10	8260	U
chloromethane	ND	10000	"	"	"	"	"	"	U
vinyl chloride	ND	10000	"	"	"	"	"	"	U
bromomethane	ND	10000	"	"	"	"	"	"	U
chloroethane	ND	10000	"	"	"	"	"	"	U
trichlorofluoromethane	ND	10000	"	"	"	"	"	"	U
1,1-dichloroethene	ND	5000	"	"	"	"	"	"	U
acetone	94900	50000	"	"	"	"	"	"	
carbon disulfide	ND	5000	"	"	"	"	"	"	U
methylene chloride	ND	10000	"	"	"	"	"	"	U
Methyl tert-butyl ether	ND	5000	"	"	"	"	"	"	U
Acrylonitrile	ND	50000	"	"	"	"	"	"	U
trans-1,2-dichloroethene	ND	5000	"	"	"	"	"	"	U
1,1-dichloroethane	ND	5000	"	"	"	"	"	"	U
vinyl acetate	ND	50000	"	"	"	"	"	"	U
2-butanone	ND	50000	"	"	"	"	"	"	U
2,2-dichloropropane	ND	5000	"	"	"	"	"	"	U
cis-1,2-dichloroethene	ND	5000	"	"	"	"	"	"	U
chloroform	ND	5000	"	"	"	"	"	"	U
bromochloromethane	ND	5000	"	"	"	"	"	"	U
1,1,1-trichloroethane	ND	5000	"	"	"	"	"	"	U
carbon tetrachloride	ND	5000	"	"	"	"	"	"	U
1,1-dichloropropene	ND	5000	"	"	"	"	"	"	U
benzene	76800	5000	"	"	"	"	"	"	
1,2-dichloroethane	ND	5000	"	"	"	"	"	"	U
trichloroethene	ND	5000	"	"	"	"	"	"	U
1,2-dichloropropane	ND	5000	"	"	"	"	"	"	U
bromodichloromethane	ND	5000	"	"	"	"	"	"	U
2-chloroethylvinyl ether	ND	50000	"	"	"	"	"	"	U
4-Methyl-2-pentanone (MIBK)	ND	50000	"	"	"	"	"	"	U
cis-1,3-dichloropropene	ND	5000	"	"	"	"	"	"	U
toluene	38400	5000	"	"	"	"	"	"	
trans-1,3-dichloropropene	ND	5000	"	"	"	"	"	"	U
1,1,2-trichloroethane	ND	5000	"	"	"	"	"	"	U
2-hexanone	ND	50000	"	"	"	"	"	"	U
tetrachloroethene	ND	5000	"	"	"	"	"	"	U
1,3-dichloropropane	ND	5000	"	"	"	"	"	"	U
dibromochloromethane	ND	5000	"	"	"	"	"	"	U
1,2-dibromoethane	ND	5000	"	"	"	"	"	"	U
1-chlorohexane	ND	5000	"	"	"	"	"	"	U
chlorobenzene	ND	5000	"	"	"	"	"	"	U
1,1,1,2-tetrachloroethane	ND	5000	"	"	"	"	"	"	U

Waste Stream Technology

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Tonawanda Coke Corporation
3875 River Road
Tonawanda NY, 14150

Project: Misc
Project Number: Tonawanda Coke - RP1355
Project Manager: Mark Kamholz

Reported:
05/28/10 15:01

Volatile Organic Compounds by EPA Method 8260B
Waste Stream Technology

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
CSIA-6F - Water (0E13002-05) Water Sampled: 05/07/10 11:02 Received: 05/07/10 13:52									
ethylbenzene	7450	5000	ug/l	1	AE01701	05/17/10	05/17/10	8260	
m,p-xylene	17300	10000	"	"	"	"	"	"	
o-xylene	21100	5000	"	"	"	"	"	"	
styrene	7950	5000	"	"	"	"	"	"	
bromoform	ND	5000	"	"	"	"	"	"	U
isopropylbenzene	15200	5000	"	"	"	"	"	"	
1,1,2,2-tetrachloroethane	ND	5000	"	"	"	"	"	"	U
bromobenzene	ND	5000	"	"	"	"	"	"	U
1,2,3-trichloropropane	ND	5000	"	"	"	"	"	"	U
n-propylbenzene	13800	5000	"	"	"	"	"	"	
2-chlorotoluene	ND	5000	"	"	"	"	"	"	U
1,3,5-trimethylbenzene	18500	5000	"	"	"	"	"	"	
4-chlorotoluene	ND	5000	"	"	"	"	"	"	U
tert-butylbenzene	ND	5000	"	"	"	"	"	"	U
1,2,4-trimethylbenzene	56400	5000	"	"	"	"	"	"	
sec-butylbenzene	ND	5000	"	"	"	"	"	"	U
p-isopropyltoluene	ND	5000	"	"	"	"	"	"	U
1,3-dichlorobenzene	ND	5000	"	"	"	"	"	"	U
1,4-dichlorobenzene	ND	5000	"	"	"	"	"	"	U
n-butylbenzene	ND	5000	"	"	"	"	"	"	U
1,2-dichlorobenzene	ND	5000	"	"	"	"	"	"	U
1,2-dibromo-3-chloropropane	ND	50000	"	"	"	"	"	"	U
1,2,4-trichlorobenzene	ND	5000	"	"	"	"	"	"	U
hexachlorobutadiene	ND	5000	"	"	"	"	"	"	U
naphthalene	519000	5000	"	"	"	"	"	"	
1,2,3-trichlorobenzene	ND	5000	"	"	"	"	"	"	U
1,1,2-trichloro-1,2,2-trifluoroethane	ND	5000	"	"	"	"	"	"	U
Surrogate: Dibromofluoromethane	100 %	85-110	"	"	"	"	"	"	
Surrogate: 1,2-Dichloroethane-d4	106 %	80-113	"	"	"	"	"	"	
Surrogate: Toluene-d8	100 %	86-111	"	"	"	"	"	"	
Surrogate: Bromofluorobenzene	105 %	85-116	"	"	"	"	"	"	

Waste Stream Technology

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Tonawanda Coke Corporation
3875 River Road
Tonawanda NY, 14150

Project: Misc
Project Number: Tonawanda Coke - RP1355
Project Manager: Mark Kamholz

Reported:
05/28/10 15:01

Volatile Organic Compounds by EPA Method 8260B
Waste Stream Technology

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
CS1A-6F - Oil (0E13002-06) Oil Sampled: 05/07/10 11:02 Received: 05/07/10 13:52									
dichlorodifluoromethane	ND	500000	ug/kg	100	AE01801	05/18/10	05/18/10	8260	U
chloromethane	ND	500000	"	"	"	"	"	"	U
vinyl chloride	ND	500000	"	"	"	"	"	"	U
bromomethane	ND	500000	"	"	"	"	"	"	U
chloroethane	ND	500000	"	"	"	"	"	"	U
trichlorofluoromethane	ND	500000	"	"	"	"	"	"	U
1,1-dichloroethene	ND	100000	"	"	"	"	"	"	U
acetone	ND	500000	"	"	"	"	"	"	U
carbon disulfide	ND	100000	"	"	"	"	"	"	U
methylene chloride	250000	100000	"	"	"	"	"	"	B
Methyl tert-butyl ether	ND	100000	"	"	"	"	"	"	U
trans-1,2-dichloroethene	ND	100000	"	"	"	"	"	"	U
1,1-dichloroethane	ND	100000	"	"	"	"	"	"	U
vinyl acetate	ND	500000	"	"	"	"	"	"	U
2-butanone	ND	500000	"	"	"	"	"	"	U
2,2-dichloropropane	ND	100000	"	"	"	"	"	"	U
cis-1,2-dichloroethene	ND	100000	"	"	"	"	"	"	U
chloroform	ND	100000	"	"	"	"	"	"	U
bromochloromethane	ND	100000	"	"	"	"	"	"	U
1,1,1-trichloroethane	ND	100000	"	"	"	"	"	"	U
carbon tetrachloride	ND	100000	"	"	"	"	"	"	U
1,1-dichloropropene	ND	100000	"	"	"	"	"	"	U
benzene	1080000	100000	"	"	"	"	"	"	U
1,2-dichloroethane	ND	100000	"	"	"	"	"	"	U
trichloroethene	ND	100000	"	"	"	"	"	"	U
1,2-dichloropropane	ND	100000	"	"	"	"	"	"	U
bromodichloromethane	ND	100000	"	"	"	"	"	"	U
4-Methyl-2-pentanone (MIBK)	ND	500000	"	"	"	"	"	"	U
cis-1,3-dichloropropene	ND	100000	"	"	"	"	"	"	U
toluene	576000	100000	"	"	"	"	"	"	U
trans-1,3-dichloropropene	ND	100000	"	"	"	"	"	"	U
1,1,2-trichloroethane	ND	100000	"	"	"	"	"	"	U
2-hexanone	ND	500000	"	"	"	"	"	"	U
tetrachloroethene	ND	100000	"	"	"	"	"	"	U
1,3-dichloropropane	ND	100000	"	"	"	"	"	"	U
dibromochloromethane	ND	100000	"	"	"	"	"	"	U
1,2-dibromoethane	ND	100000	"	"	"	"	"	"	U
1-chlorohexane	ND	100000	"	"	"	"	"	"	U
chlorobenzene	ND	100000	"	"	"	"	"	"	U
1,1,1,2-tetrachloroethane	ND	100000	"	"	"	"	"	"	U
ethylbenzene	135000	100000	"	"	"	"	"	"	U
m,p-xylene	328000	200000	"	"	"	"	"	"	U

Waste Stream Technology

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Tonawanda Coke Corporation
3875 River Road
Tonawanda NY, 14150

Project: Misc
Project Number: Tonawanda Coke - RP1355
Project Manager: Mark Kamholz

Reported:
05/28/10 15:01

Volatile Organic Compounds by EPA Method 8260B
Waste Stream Technology

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
CS1A-6F - Oil (0E13002-06) Oil Sampled: 05/07/10 11:02 Received: 05/07/10 13:52									
o-xylene	386000	100000	ug/kg	100	AE01801	05/18/10	05/18/10	8260	
styrene	116000	100000	"	"	"	"	"	"	
bromoform	ND	100000	"	"	"	"	"	"	U
isopropylbenzene	264000	100000	"	"	"	"	"	"	
1,1,2,2-tetrachloroethane	ND	100000	"	"	"	"	"	"	U
bromobenzene	ND	100000	"	"	"	"	"	"	U
1,2,3-trichloropropane	ND	100000	"	"	"	"	"	"	U
n-propylbenzene	254000	100000	"	"	"	"	"	"	
2-chlorotoluene	ND	100000	"	"	"	"	"	"	U
1,3,5-trimethylbenzene	340000	100000	"	"	"	"	"	"	
4-chlorotoluene	ND	100000	"	"	"	"	"	"	U
tert-butylbenzene	ND	100000	"	"	"	"	"	"	U
1,2,4-trimethylbenzene	1010000	100000	"	"	"	"	"	"	
sec-butylbenzene	ND	100000	"	"	"	"	"	"	U
p-isopropyltoluene	ND	100000	"	"	"	"	"	"	U
1,3-dichlorobenzene	ND	100000	"	"	"	"	"	"	U
1,4-dichlorobenzene	ND	100000	"	"	"	"	"	"	U
n-butylbenzene	ND	100000	"	"	"	"	"	"	U
1,2-dichlorobenzene	ND	100000	"	"	"	"	"	"	U
1,2-dibromo-3-chloropropane	ND	500000	"	"	"	"	"	"	U
1,2,4-trichlorobenzene	ND	100000	"	"	"	"	"	"	U
hexachlorobutadiene	ND	100000	"	"	"	"	"	"	U
naphthalene	5830000	100000	"	"	"	"	"	"	
1,2,3-trichlorobenzene	ND	100000	"	"	"	"	"	"	U
1,1,2-trichloro-1,2,2-trifluoroethane	ND	100000	"	"	"	"	"	"	U
Surrogate: 1,2-Dichloroethane-d4		%	79-118		"	"	"	"	S-01, U
Surrogate: Dibromofluoromethane		%	78-115		"	"	"	"	S-01, U
Surrogate: Toluene-d8		%	84-110		"	"	"	"	S-01, U
Surrogate: Bromofluorobenzene		%	81-118		"	"	"	"	S-01, U

Waste Stream Technology

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Tonawanda Coke Corporation
3875 River Road
Tonawanda NY, 14150

Project: Misc
Project Number: Tonawanda Coke - RP1355
Project Manager: Mark Kamholz

Reported:
05/28/10 15:01

Semivolatile Organic Compounds by EPA Method 8270C
Waste Stream Technology

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
CS1A-4F - Water (0E13002-01) Water Sampled: 05/07/10 10:55 Received: 05/07/10 13:52									
n-nitrosodimethylamine	ND	200	ug/l	20	AE01408	05/14/10	05/18/10	8270	U
bis(2-Chloroethyl)ether	ND	200	"	"	"	"	"	"	U
Phenol	30800	4000	"	200	"	"	"	"	D
2-Chlorophenol	ND	400	"	20	"	"	"	"	U
1,3-Dichlorobenzene	ND	200	"	"	"	"	"	"	U
1,4-Dichlorobenzene	ND	200	"	"	"	"	"	"	U
1,2-Dichlorobenzene	ND	200	"	"	"	"	"	"	U
Benzyl alcohol	ND	200	"	"	"	"	"	"	U
bis(2-chloroisopropyl)ether	ND	200	"	"	"	"	"	"	U
2-Methylphenol	428	200	"	"	"	"	"	"	
Hexachloroethane	ND	200	"	"	"	"	"	"	U
N-Nitrosodi-n-propylamine	ND	200	"	"	"	"	"	"	U
3 & 4-methylphenol	6320	400	"	"	"	"	"	"	
Nitrobenzene	ND	200	"	"	"	"	"	"	U
Isophorone	ND	200	"	"	"	"	"	"	U
2-Nitrophenol	ND	400	"	"	"	"	"	"	U
2,4-Dimethylphenol	598	400	"	"	"	"	"	"	
Bis(2-chloroethoxy)methane	ND	200	"	"	"	"	"	"	U
Benzoic acid	ND	1000	"	"	"	"	"	"	U
2,4-Dichlorophenol	ND	400	"	"	"	"	"	"	U
1,2,4-Trichlorobenzene	ND	200	"	"	"	"	"	"	U
Naphthalene	23800	2000	"	200	"	"	"	"	D
3,3'-Dichlorobenzidine	ND	200	"	20	"	"	"	"	U
4-Chloroaniline	ND	200	"	"	"	"	"	"	U
Hexachlorobutadiene	ND	200	"	"	"	"	"	"	U
4-Chloro-3-methylphenol	ND	400	"	"	"	"	"	"	U
2-Methylnaphthalene	6520	200	"	"	"	"	"	"	
Hexachlorocyclopentadiene	ND	400	"	"	"	"	"	"	U
2,4,6-Trichlorophenol	ND	400	"	"	"	"	"	"	U
2,4,5-Trichlorophenol	ND	200	"	"	"	"	"	"	U
2-Chloronaphthalene	ND	200	"	"	"	"	"	"	U
2-Nitroaniline	ND	200	"	"	"	"	"	"	U
Acenaphthylene	2760	200	"	"	"	"	"	"	
Dimethyl phthalate	ND	200	"	"	"	"	"	"	U
2,6-Dinitrotoluene	ND	200	"	"	"	"	"	"	U
Acenaphthene	972	200	"	"	"	"	"	"	
3-Nitroaniline	ND	200	"	"	"	"	"	"	U
2,4-Dinitrophenol	ND	400	"	"	"	"	"	"	U
Dibenzofuran	1910	200	"	"	"	"	"	"	
2,4-Dinitrotoluene	ND	200	"	"	"	"	"	"	U
4-Nitrophenol	ND	400	"	"	"	"	"	"	U
Fluorene	1390	200	"	"	"	"	"	"	

Waste Stream Technology

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Tonawanda Coke Corporation
3875 River Road
Tonawanda NY, 14150

Project: Misc
Project Number: Tonawanda Coke - RP1355
Project Manager: Mark Kamholz

Reported:
05/28/10 15:01

Semivolatile Organic Compounds by EPA Method 8270C
Waste Stream Technology

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
CS1A-4F - Water (0E13002-01) Water Sampled: 05/07/10 10:55 Received: 05/07/10 13:52									
4-Chlorophenyl phenyl ether	ND	200	ug/l	20	AE01408	05/14/10	05/18/10	8270	U
Diethyl phthalate	ND	200	"	"	"	"	"	"	U
4-Nitroaniline	ND	200	"	"	"	"	"	"	U
4,6-Dinitro-2-methylphenol	ND	400	"	"	"	"	"	"	U
n-Nitrosodiphenylamine	587	200	"	"	"	"	"	"	
4-bromophenylphenylether	ND	200	"	"	"	"	"	"	U
Hexachlorobenzene	ND	200	"	"	"	"	"	"	U
Pentachlorophenol	ND	400	"	"	"	"	"	"	U
Phenanthrene	5160	200	"	"	"	"	"	"	
Anthracene	1000	200	"	"	"	"	"	"	
Carbazole	1440	200	"	"	"	"	"	"	
Di-n-butyl phthalate	ND	200	"	"	"	"	"	"	U
Benzidine	ND	1000	"	"	"	"	"	"	U
Fluoranthene	3260	200	"	"	"	"	"	"	
Pyrene	2510	200	"	"	"	"	"	"	
Butyl benzyl phthalate	ND	200	"	"	"	"	"	"	U
Benzo (a) anthracene	702	200	"	"	"	"	"	"	
Chrysene	686	200	"	"	"	"	"	"	
bis(2-Ethylhexyl)phthalate	ND	200	"	"	"	"	"	"	U
Di-n-octyl phthalate	ND	200	"	"	"	"	"	"	U
Benzo (b) fluoranthene	754	200	"	"	"	"	"	"	
Benzo (k) fluoranthene	416	200	"	"	"	"	"	"	
Benzo (a) pyrene	561	200	"	"	"	"	"	"	
Indeno (1,2,3-cd) pyrene	222	200	"	"	"	"	"	"	
Dibenz (a,h) anthracene	ND	200	"	"	"	"	"	"	U
Benzo (g,h,i) perylene	256	200	"	"	"	"	"	"	
Surrogate: 2-Fluorophenol		%	27-67		"	"	"	"	S-01, U
Surrogate: Phenol-d6		%	16-49		"	"	"	"	S-01, U
Surrogate: Nitrobenzene-d5		%	53-100		"	"	"	"	S-01, U
Surrogate: 2-Fluorobiphenyl		%	52-98		"	"	"	"	S-01, U
Surrogate: 2,4,6-Tribromophenol		%	46-123		"	"	"	"	S-01, U
Surrogate: Terphenyl-d14		%	35-124		"	"	"	"	S-01, U

Waste Stream Technology

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Tonawanda Coke Corporation
3875 River Road
Tonawanda NY, 14150

Project: Misc
Project Number: Tonawanda Coke - RP1355
Project Manager: Mark Kamholz

Reported:
05/28/10 15:01

Semivolatile Organic Compounds by EPA Method 8270C
Waste Stream Technology

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
CS1A-4F - Oil (0E13002-02) Oil Sampled: 05/07/10 10:55 Received: 05/07/10 13:52									
N-Nitrosodimethylamine	ND	80	mg/kg	20	AE02101	05/21/10	05/22/10	EPA 8270C	U
bis(2-chloroethyl)ether	ND	80	"	"	"	"	"	"	U
phenol	1790	160	"	"	"	"	"	"	
2-chlorophenol	ND	160	"	"	"	"	"	"	U
1,3-dichlorobenzene	ND	80	"	"	"	"	"	"	U
1,4-dichlorobenzene	ND	80	"	"	"	"	"	"	U
1,2-dichlorobenzene	ND	80	"	"	"	"	"	"	U
benzyl alcohol	ND	80	"	"	"	"	"	"	U
bis(2-chloroisopropyl)ether	ND	80	"	"	"	"	"	"	U
2-methylphenol	ND	80	"	"	"	"	"	"	U
hexachloroethane	ND	80	"	"	"	"	"	"	U
N-Nitrosodi-n-propylamine	ND	80	"	"	"	"	"	"	U
3 & 4-methylphenol	190	160	"	"	"	"	"	"	
nitrobenzene	ND	80	"	"	"	"	"	"	U
isophorone	ND	80	"	"	"	"	"	"	U
2-nitrophenol	ND	160	"	"	"	"	"	"	U
2,4-dimethylphenol	ND	160	"	"	"	"	"	"	U
Bis(2-chloroethoxy)methane	ND	80	"	"	"	"	"	"	U
benzoic acid	ND	400	"	"	"	"	"	"	U
2,4-dichlorophenol	ND	160	"	"	"	"	"	"	U
1,2,4-trichlorobenzene	ND	80	"	"	"	"	"	"	U
naphthalene	6000	80	"	"	"	"	"	"	
4-chloroaniline	ND	80	"	"	"	"	"	"	U
hexachlorobutadiene	ND	80	"	"	"	"	"	"	U
4-chloro-3-methylphenol	ND	160	"	"	"	"	"	"	U
2-methylnaphthalene	1810	80	"	"	"	"	"	"	
hexachlorocyclopentadiene	ND	160	"	"	"	"	"	"	U
2,4,6-trichlorophenol	ND	160	"	"	"	"	"	"	U
2,4,5-trichlorophenol	ND	80	"	"	"	"	"	"	U
2-chloronaphthalene	ND	80	"	"	"	"	"	"	U
2-nitroaniline	ND	80	"	"	"	"	"	"	U
acenaphthylene	498	80	"	"	"	"	"	"	
Dimethyl phthalate	ND	80	"	"	"	"	"	"	U
2,6-dinitrotoluene	ND	80	"	"	"	"	"	"	U
acenaphthene	272	80	"	"	"	"	"	"	
3-nitroaniline	ND	80	"	"	"	"	"	"	U
2,4-dinitrophenol	ND	160	"	"	"	"	"	"	U
dibenzofuran	469	80	"	"	"	"	"	"	
2,4-dinitrotoluene	ND	80	"	"	"	"	"	"	U
4-nitrophenol	ND	160	"	"	"	"	"	"	U
fluorene	372	80	"	"	"	"	"	"	
4-Chlorophenyl phenyl ether	ND	80	"	"	"	"	"	"	U

Waste Stream Technology

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Tonawanda Coke Corporation
3875 River Road
Tonawanda NY, 14150

Project: Misc
Project Number: Tonawanda Coke - RP1355
Project Manager: Mark Kamholz

Reported:
05/28/10 15:01

Semivolatile Organic Compounds by EPA Method 8270C
Waste Stream Technology

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
CS1A-4F - Oil (0E13002-02) Oil Sampled: 05/07/10 10:55 Received: 05/07/10 13:52									
Diethyl phthalate	ND	80	mg/kg	20	AE02101	05/21/10	05/22/10	EPA 8270C	U
4-nitroaniline	ND	80	"	"	"	"	"	"	U
4,6-Dinitro-2-methylphenol	ND	160	"	"	"	"	"	"	U
n-nitrosodiphenylamine	ND	80	"	"	"	"	"	"	U
4-bromophenylphenylether	ND	80	"	"	"	"	"	"	U
hexachlorobenzene	ND	80	"	"	"	"	"	"	U
pentachlorophenol	ND	160	"	"	"	"	"	"	U
phenanthrene	1460	80	"	"	"	"	"	"	
anthracene	220	80	"	"	"	"	"	"	
carbazole	89	80	"	"	"	"	"	"	
Di-n-butyl phthalate	ND	80	"	"	"	"	"	"	U
benzidine	ND	400	"	"	"	"	"	"	U
fluoranthene	870	80	"	"	"	"	"	"	
pyrene	808	80	"	"	"	"	"	"	
3,3'-Dichlorobenzidine	ND	80	"	"	"	"	"	"	U
Butyl benzyl phthalate	ND	80	"	"	"	"	"	"	U
Benzo (a) anthracene	225	80	"	"	"	"	"	"	
chrysene	133	80	"	"	"	"	"	"	
bis(2-ethylhexyl)phthalate	ND	80	"	"	"	"	"	"	U
Di-n-octyl phthalate	ND	80	"	"	"	"	"	"	U
Benzo (b) fluoranthene	297	80	"	"	"	"	"	"	
Benzo (k) fluoranthene	107	80	"	"	"	"	"	"	
Benzo (a) pyrene	186	80	"	"	"	"	"	"	
Indeno (1,2,3-cd) pyrene	ND	80	"	"	"	"	"	"	U
Dibenz (a,h) anthracene	ND	80	"	"	"	"	"	"	U
Benzo (g,h,i) perylene	122	80	"	"	"	"	"	"	
Surrogate: 2-Fluorophenol		71.9 %	59-101		"	"	"	"	
Surrogate: Phenol-d6		45.5 %	64-105		"	"	"	"	S-04
Surrogate: Nitrobenzene-d5		83.6 %	58-105		"	"	"	"	
Surrogate: 2-Fluorobiphenyl		80.4 %	67-101		"	"	"	"	
Surrogate: 2,4,6-Tribromophenol		120 %	63-108		"	"	"	"	S-04
Surrogate: Terphenyl-d14		103 %	38-133		"	"	"	"	

Waste Stream Technology

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Tonawanda Coke Corporation
3875 River Road
Tonawanda NY, 14150

Project: Misc
Project Number: Tonawanda Coke - RP1355
Project Manager: Mark Kamholz

Reported:
05/28/10 15:01

Semivolatile Organic Compounds by EPA Method 8270C
Waste Stream Technology

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
CS1A-5F - Water (0E13002-03) Water Sampled: 05/07/10 10:59 Received: 05/07/10 13:52									
n-nitrosodimethylamine	ND	200	ug/l	20	AE01408	05/14/10	05/18/10	8270	U
bis(2-Chloroethyl)ether	ND	200	"	"	"	"	"	"	U
Phenol	35300	4000	"	200	"	"	"	"	D
2-Chlorophenol	ND	400	"	20	"	"	"	"	U
1,3-Dichlorobenzene	ND	200	"	"	"	"	"	"	U
1,4-Dichlorobenzene	ND	200	"	"	"	"	"	"	U
1,2-Dichlorobenzene	ND	200	"	"	"	"	"	"	U
Benzyl alcohol	ND	200	"	"	"	"	"	"	U
bis(2-chloroisopropyl)ether	ND	200	"	"	"	"	"	"	U
2-Methylphenol	517	200	"	"	"	"	"	"	
Hexachloroethane	ND	200	"	"	"	"	"	"	U
N-Nitrosodi-n-propylamine	ND	200	"	"	"	"	"	"	U
3 & 4-methylphenol	7460	400	"	"	"	"	"	"	
Nitrobenzene	ND	200	"	"	"	"	"	"	U
Isophorone	ND	200	"	"	"	"	"	"	U
2-Nitrophenol	ND	400	"	"	"	"	"	"	U
2,4-Dimethylphenol	695	400	"	"	"	"	"	"	
Bis(2-chloroethoxy)methane	ND	200	"	"	"	"	"	"	U
Benzoic acid	ND	1000	"	"	"	"	"	"	U
2,4-Dichlorophenol	ND	400	"	"	"	"	"	"	U
1,2,4-Trichlorobenzene	ND	200	"	"	"	"	"	"	U
Naphthalene	22400	2000	"	200	"	"	"	"	D
3,3'-Dichlorobenzidine	ND	200	"	20	"	"	"	"	U
4-Chloroaniline	ND	200	"	"	"	"	"	"	U
Hexachlorobutadiene	ND	200	"	"	"	"	"	"	U
4-Chloro-3-methylphenol	ND	400	"	"	"	"	"	"	U
2-Methylnaphthalene	6270	200	"	"	"	"	"	"	
Hexachlorocyclopentadiene	ND	400	"	"	"	"	"	"	U
2,4,6-Trichlorophenol	ND	400	"	"	"	"	"	"	U
2,4,5-Trichlorophenol	ND	200	"	"	"	"	"	"	U
2-Chloronaphthalene	ND	200	"	"	"	"	"	"	U
2-Nitroaniline	ND	200	"	"	"	"	"	"	U
Acenaphthylene	2590	200	"	"	"	"	"	"	
Dimethyl phthalate	ND	200	"	"	"	"	"	"	U
2,6-Dinitrotoluene	ND	200	"	"	"	"	"	"	U
Acenaphthene	940	200	"	"	"	"	"	"	
3-Nitroaniline	ND	200	"	"	"	"	"	"	U
2,4-Dinitrophenol	ND	400	"	"	"	"	"	"	U
Dibenzofuran	1840	200	"	"	"	"	"	"	
2,4-Dinitrotoluene	ND	200	"	"	"	"	"	"	U
4-Nitrophenol	ND	400	"	"	"	"	"	"	U
Fluorene	1340	200	"	"	"	"	"	"	

Waste Stream Technology

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Tonawanda Coke Corporation
3875 River Road
Tonawanda NY, 14150

Project: Misc
Project Number: Tonawanda Coke - RP1355
Project Manager: Mark Kamholz

Reported:
05/28/10 15:01

Semivolatile Organic Compounds by EPA Method 8270C
Waste Stream Technology

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
CS1A-5F - Water (0E13002-03) Water Sampled: 05/07/10 10:59 Received: 05/07/10 13:52									
4-Chlorophenyl phenyl ether	ND	200	ug/l	20	AE01408	05/14/10	05/18/10	8270	U
Diethyl phthalate	ND	200	"	"	"	"	"	"	U
4-Nitroaniline	ND	200	"	"	"	"	"	"	U
4,6-Dinitro-2-methylphenol	ND	400	"	"	"	"	"	"	U
n-Nitrosodiphenylamine	566	200	"	"	"	"	"	"	
4-bromophenylphenylether	ND	200	"	"	"	"	"	"	U
Hexachlorobenzene	ND	200	"	"	"	"	"	"	U
Pentachlorophenol	ND	400	"	"	"	"	"	"	U
Phenanthrene	5100	200	"	"	"	"	"	"	
Anthracene	993	200	"	"	"	"	"	"	
Carbazole	1360	200	"	"	"	"	"	"	
Di-n-butyl phthalate	ND	200	"	"	"	"	"	"	U
Benzidine	ND	1000	"	"	"	"	"	"	U
Fluoranthene	3220	200	"	"	"	"	"	"	
Pyrene	2720	200	"	"	"	"	"	"	
Butyl benzyl phthalate	ND	200	"	"	"	"	"	"	U
Benzo (a) anthracene	666	200	"	"	"	"	"	"	
Chrysene	703	200	"	"	"	"	"	"	
bis(2-Ethylhexyl)phthalate	ND	200	"	"	"	"	"	"	U
Di-n-octyl phthalate	ND	200	"	"	"	"	"	"	U
Benzo (b) fluoranthene	807	200	"	"	"	"	"	"	
Benzo (k) fluoranthene	290	200	"	"	"	"	"	"	
Benzo (a) pyrene	531	200	"	"	"	"	"	"	
Indeno (1,2,3-cd) pyrene	ND	200	"	"	"	"	"	"	U
Dibenz (a,h) anthracene	ND	200	"	"	"	"	"	"	U
Benzo (g,h,i) perylene	ND	200	"	"	"	"	"	"	U
Surrogate: 2-Fluorophenol		%	27-67		"	"	"	"	S-01, U
Surrogate: Phenol-d6		%	16-49		"	"	"	"	S-01, U
Surrogate: Nitrobenzene-d5		%	53-100		"	"	"	"	S-01, U
Surrogate: 2-Fluorobiphenyl		%	52-98		"	"	"	"	S-01, U
Surrogate: 2,4,6-Tribromophenol		%	46-123		"	"	"	"	S-01, U
Surrogate: Terphenyl-d14		%	35-124		"	"	"	"	S-01, U

Waste Stream Technology

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Tonawanda Coke Corporation
3875 River Road
Tonawanda NY, 14150

Project: Misc
Project Number: Tonawanda Coke - RP1355
Project Manager: Mark Kamholz

Reported:
05/28/10 15:01

Semivolatile Organic Compounds by EPA Method 8270C
Waste Stream Technology

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
CS1A-5F - Oil (OE13002-04) Oil Sampled: 05/07/10 10:59 Received: 05/07/10 13:52									
N-Nitrosodimethylamine	ND	80	mg/kg	20	AE02101	05/21/10	05/25/10	EPA 8270C	U
bis(2-chloroethyl)ether	ND	80	"	"	"	"	"	"	U
phenol	1690	160	"	"	"	"	"	"	
2-chlorophenol	ND	160	"	"	"	"	"	"	U
1,3-dichlorobenzene	ND	80	"	"	"	"	"	"	U
1,4-dichlorobenzene	ND	80	"	"	"	"	"	"	U
1,2-dichlorobenzene	ND	80	"	"	"	"	"	"	U
benzyl alcohol	ND	80	"	"	"	"	"	"	U
bis(2-chloroisopropyl)ether	ND	80	"	"	"	"	"	"	U
2-methylphenol	ND	80	"	"	"	"	"	"	U
hexachloroethane	ND	80	"	"	"	"	"	"	U
N-Nitrosodi-n-propylamine	ND	80	"	"	"	"	"	"	U
3 & 4-methylphenol	325	160	"	"	"	"	"	"	
nitrobenzene	ND	80	"	"	"	"	"	"	U
isophorone	ND	80	"	"	"	"	"	"	U
2-nitrophenol	ND	160	"	"	"	"	"	"	U
2,4-dimethylphenol	ND	160	"	"	"	"	"	"	U
Bis(2-chloroethoxy)methane	ND	80	"	"	"	"	"	"	U
benzoic acid	ND	400	"	"	"	"	"	"	U
2,4-dichlorophenol	ND	160	"	"	"	"	"	"	U
1,2,4-trichlorobenzene	ND	80	"	"	"	"	"	"	U
naphthalene	5450	80	"	"	"	"	"	"	
4-chloroaniline	ND	80	"	"	"	"	"	"	U
hexachlorobutadiene	ND	80	"	"	"	"	"	"	U
4-chloro-3-methylphenol	ND	160	"	"	"	"	"	"	U
2-methylnaphthalene	1850	80	"	"	"	"	"	"	
hexachlorocyclopentadiene	ND	160	"	"	"	"	"	"	U
2,4,6-trichlorophenol	ND	160	"	"	"	"	"	"	U
2,4,5-trichlorophenol	ND	80	"	"	"	"	"	"	U
2-chloronaphthalene	ND	80	"	"	"	"	"	"	U
2-nitroaniline	ND	80	"	"	"	"	"	"	U
acenaphthylene	553	80	"	"	"	"	"	"	
Dimethyl phthalate	ND	80	"	"	"	"	"	"	U
2,6-dinitrotoluene	ND	80	"	"	"	"	"	"	U
acenaphthene	277	80	"	"	"	"	"	"	
3-nitroaniline	ND	80	"	"	"	"	"	"	U
2,4-dinitrophenol	ND	160	"	"	"	"	"	"	U
dibenzofuran	430	80	"	"	"	"	"	"	
2,4-dinitrotoluene	ND	80	"	"	"	"	"	"	U
4-nitrophenol	ND	160	"	"	"	"	"	"	U
fluorene	397	80	"	"	"	"	"	"	
4-Chlorophenyl phenyl ether	ND	80	"	"	"	"	"	"	U

Waste Stream Technology

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Tonawanda Coke Corporation
3875 River Road
Tonawanda NY, 14150

Project: Misc
Project Number: Tonawanda Coke - RP1355
Project Manager: Mark Kamholz

Reported:
05/28/10 15:01

Semivolatile Organic Compounds by EPA Method 8270C
Waste Stream Technology

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
CS1A-5F - Oil (0E13002-04) Oil Sampled: 05/07/10 10:59 Received: 05/07/10 13:52									
Diethyl phthalate	ND	80	mg/kg	20	AE02101	05/21/10	05/25/10	EPA 8270C	U
4-nitroaniline	ND	80	"	"	"	"	"	"	U
4,6-Dinitro-2-methylphenol	ND	160	"	"	"	"	"	"	U
n-nitrosodiphenylamine	ND	80	"	"	"	"	"	"	U
4-bromophenylphenylether	ND	80	"	"	"	"	"	"	U
hexachlorobenzene	ND	80	"	"	"	"	"	"	U
pentachlorophenol	ND	160	"	"	"	"	"	"	U
phenanthrene	1290	80	"	"	"	"	"	"	
anthracene	229	80	"	"	"	"	"	"	
carbazole	ND	80	"	"	"	"	"	"	U
Di-n-butyl phthalate	ND	80	"	"	"	"	"	"	U
benzidine	ND	400	"	"	"	"	"	"	U
fluoranthene	775	80	"	"	"	"	"	"	
3,3'-Dichlorobenzidine	ND	80	"	"	"	"	"	"	U
pyrene	702	80	"	"	"	"	"	"	
Butyl benzyl phthalate	ND	80	"	"	"	"	"	"	U
Benzo (a) anthracene	228	80	"	"	"	"	"	"	
chrysene	200	80	"	"	"	"	"	"	
bis(2-ethylhexyl)phthalate	ND	80	"	"	"	"	"	"	U
Di-n-octyl phthalate	ND	80	"	"	"	"	"	"	U
Benzo (b) fluoranthene	229	80	"	"	"	"	"	"	
Benzo (k) fluoranthene	88	80	"	"	"	"	"	"	
Benzo (a) pyrene	176	80	"	"	"	"	"	"	
Indeno (1,2,3-cd) pyrene	104	80	"	"	"	"	"	"	
Dibenz (a,h) anthracene	ND	80	"	"	"	"	"	"	U
Benzo (g,h,i) perylene	122	80	"	"	"	"	"	"	
Surrogate: 2-Fluorophenol		66.9 %	59-101		"	"	"	"	
Surrogate: Phenol-d6		77.3 %	64-105		"	"	"	"	
Surrogate: Nitrobenzene-d5		84.4 %	58-105		"	"	"	"	
Surrogate: 2-Fluorobiphenyl		91.2 %	67-101		"	"	"	"	
Surrogate: 2,4,6-Tribromophenol		87.5 %	63-108		"	"	"	"	
Surrogate: Terphenyl-d14		96.4 %	38-133		"	"	"	"	

Waste Stream Technology

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Tonawanda Coke Corporation
3875 River Road
Tonawanda NY, 14150

Project: Misc
Project Number: Tonawanda Coke - RP1355
Project Manager: Mark Kamholz

Reported:
05/28/10 15:01

Semivolatile Organic Compounds by EPA Method 8270C
Waste Stream Technology

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
CS1A-6F - Water (0E13002-05) Water Sampled: 05/07/10 11:02 Received: 05/07/10 13:52									
n-nitrosodimethylamine	ND	200	ug/l	20	AE01408	05/14/10	05/18/10	8270	U
bis(2-Chloroethyl)ether	ND	200	"	"	"	"	"	"	U
Phenol	14900	400	"	"	"	"	"	"	
2-Chlorophenol	ND	400	"	"	"	"	"	"	U
1,3-Dichlorobenzene	ND	200	"	"	"	"	"	"	U
1,4-Dichlorobenzene	ND	200	"	"	"	"	"	"	U
1,2-Dichlorobenzene	ND	200	"	"	"	"	"	"	U
Benzyl alcohol	ND	200	"	"	"	"	"	"	U
bis(2-chloroisopropyl)ether	ND	200	"	"	"	"	"	"	U
2-Methylphenol	268	200	"	"	"	"	"	"	
Hexachloroethane	ND	200	"	"	"	"	"	"	U
N-Nitrosodi-n-propylamine	ND	200	"	"	"	"	"	"	U
3 & 4-methylphenol	3730	400	"	"	"	"	"	"	
Nitrobenzene	ND	200	"	"	"	"	"	"	U
Isophorone	ND	200	"	"	"	"	"	"	U
2-Nitrophenol	ND	400	"	"	"	"	"	"	U
2,4-Dimethylphenol	ND	400	"	"	"	"	"	"	U
Bis(2-chloroethoxy)methane	ND	200	"	"	"	"	"	"	U
Benzoic acid	ND	1000	"	"	"	"	"	"	U
2,4-Dichlorophenol	ND	400	"	"	"	"	"	"	U
1,2,4-Trichlorobenzene	ND	200	"	"	"	"	"	"	U
Naphthalene	20600	2000	"	200	"	"	"	"	D
3,3'-Dichlorobenzidine	ND	200	"	20	"	"	"	"	U
4-Chloroaniline	ND	200	"	"	"	"	"	"	U
Hexachlorobutadiene	ND	200	"	"	"	"	"	"	U
4-Chloro-3-methylphenol	ND	400	"	"	"	"	"	"	U
2-Methylnaphthalene	5640	200	"	"	"	"	"	"	
Hexachlorocyclopentadiene	ND	400	"	"	"	"	"	"	U
2,4,6-Trichlorophenol	ND	400	"	"	"	"	"	"	U
2,4,5-Trichlorophenol	ND	200	"	"	"	"	"	"	U
2-Chloronaphthalene	ND	200	"	"	"	"	"	"	U
2-Nitroaniline	ND	200	"	"	"	"	"	"	U
Acenaphthylene	2350	200	"	"	"	"	"	"	
Dimethyl phthalate	ND	200	"	"	"	"	"	"	U
2,6-Dinitrotoluene	ND	200	"	"	"	"	"	"	U
Acenaphthene	843	200	"	"	"	"	"	"	
3-Nitroaniline	ND	200	"	"	"	"	"	"	U
2,4-Dinitrophenol	ND	400	"	"	"	"	"	"	U
Dibenzofuran	1640	200	"	"	"	"	"	"	
2,4-Dinitrotoluene	ND	200	"	"	"	"	"	"	U
4-Nitrophenol	ND	400	"	"	"	"	"	"	U
Fluorene	1180	200	"	"	"	"	"	"	

Waste Stream Technology

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Tonawanda Coke Corporation
3875 River Road
Tonawanda NY, 14150

Project: Misc
Project Number: Tonawanda Coke - RP1355
Project Manager: Mark Kamholz

Reported:
05/28/10 15:01

Semivolatile Organic Compounds by EPA Method 8270C
Waste Stream Technology

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
CS1A-6F - Water (0E13002-05) Water Sampled: 05/07/10 11:02 Received: 05/07/10 13:52									
4-Chlorophenyl phenyl ether	ND	200	ug/l	20	AE01408	05/14/10	05/18/10	8270	U
Diethyl phthalate	ND	200	"	"	"	"	"	"	U
4-Nitroaniline	ND	200	"	"	"	"	"	"	U
4,6-Dinitro-2-methylphenol	ND	400	"	"	"	"	"	"	U
n-Nitrosodiphenylamine	478	200	"	"	"	"	"	"	
4-bromophenylphenylether	ND	200	"	"	"	"	"	"	U
Hexachlorobenzene	ND	200	"	"	"	"	"	"	U
Pentachlorophenol	ND	400	"	"	"	"	"	"	U
Phenanthrene	4330	200	"	"	"	"	"	"	
Anthracene	808	200	"	"	"	"	"	"	
Carbazole	1140	200	"	"	"	"	"	"	
Di-n-butyl phthalate	ND	200	"	"	"	"	"	"	U
Benzidine	ND	1000	"	"	"	"	"	"	U
Fluoranthene	2460	200	"	"	"	"	"	"	
Pyrene	2110	200	"	"	"	"	"	"	
Butyl benzyl phthalate	ND	200	"	"	"	"	"	"	U
Benzo (a) anthracene	494	200	"	"	"	"	"	"	
Chrysene	535	200	"	"	"	"	"	"	
bis(2-Ethylhexyl)phthalate	ND	200	"	"	"	"	"	"	U
Di-n-octyl phthalate	ND	200	"	"	"	"	"	"	U
Benzo (b) fluoranthene	614	200	"	"	"	"	"	"	
Benzo (k) fluoranthene	216	200	"	"	"	"	"	"	
Benzo (a) pyrene	423	200	"	"	"	"	"	"	
Indeno (1,2,3-cd) pyrene	ND	200	"	"	"	"	"	"	U
Dibenz (a,h) anthracene	ND	200	"	"	"	"	"	"	U
Benzo (g,h,i) perylene	ND	200	"	"	"	"	"	"	U
Surrogate: 2-Fluorophenol		%	27-67		"	"	"	"	S-01, U
Surrogate: Phenol-d6		%	16-49		"	"	"	"	S-01, U
Surrogate: Nitrobenzene-d5		%	53-100		"	"	"	"	S-01, U
Surrogate: 2-Fluorobiphenyl		%	52-98		"	"	"	"	S-01, U
Surrogate: 2,4,6-Tribromophenol		%	46-123		"	"	"	"	S-01, U
Surrogate: Terphenyl-d14		%	35-124		"	"	"	"	S-01, U

Waste Stream Technology

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Tonawanda Coke Corporation
3875 River Road
Tonawanda NY, 14150

Project: Misc
Project Number: Tonawanda Coke - RP1355
Project Manager: Mark Kamholz

Reported:
05/28/10 15:01

Semivolatile Organic Compounds by EPA Method 8270C
Waste Stream Technology

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
CS1A-6F - Oil (0E13002-06) Oil Sampled: 05/07/10 11:02 Received: 05/07/10 13:52									
N-Nitrosodimethylamine	ND	80	mg/kg	20	AE02101	05/21/10	05/25/10	EPA 8270C	U
bis(2-chloroethyl)ether	ND	80	"	"	"	"	"	"	U
phenol	1660	160	"	"	"	"	"	"	
2-chlorophenol	ND	160	"	"	"	"	"	"	U
1,3-dichlorobenzene	ND	80	"	"	"	"	"	"	U
1,4-dichlorobenzene	ND	80	"	"	"	"	"	"	U
1,2-dichlorobenzene	ND	80	"	"	"	"	"	"	U
benzyl alcohol	ND	80	"	"	"	"	"	"	U
bis(2-chloroisopropyl)ether	ND	80	"	"	"	"	"	"	U
2-methylphenol	ND	80	"	"	"	"	"	"	U
hexachloroethane	ND	80	"	"	"	"	"	"	U
N-Nitrosodi-n-propylamine	ND	80	"	"	"	"	"	"	U
3 & 4-methylphenol	342	160	"	"	"	"	"	"	
nitrobenzene	ND	80	"	"	"	"	"	"	U
isophorone	ND	80	"	"	"	"	"	"	U
2-nitrophenol	ND	160	"	"	"	"	"	"	U
2,4-dimethylphenol	ND	160	"	"	"	"	"	"	U
Bis(2-chloroethoxy)methane	ND	80	"	"	"	"	"	"	U
benzoic acid	ND	400	"	"	"	"	"	"	U
2,4-dichlorophenol	ND	160	"	"	"	"	"	"	U
1,2,4-trichlorobenzene	ND	80	"	"	"	"	"	"	U
naphthalene	6290	80	"	"	"	"	"	"	
4-chloroaniline	ND	80	"	"	"	"	"	"	U
hexachlorobutadiene	ND	80	"	"	"	"	"	"	U
4-chloro-3-methylphenol	ND	160	"	"	"	"	"	"	U
2-methylnaphthalene	2080	80	"	"	"	"	"	"	
hexachlorocyclopentadiene	ND	160	"	"	"	"	"	"	U
2,4,6-trichlorophenol	ND	160	"	"	"	"	"	"	U
2,4,5-trichlorophenol	ND	80	"	"	"	"	"	"	U
2-chloronaphthalene	ND	80	"	"	"	"	"	"	U
2-nitroaniline	ND	80	"	"	"	"	"	"	U
acenaphthylene	580	80	"	"	"	"	"	"	
Dimethyl phthalate	ND	80	"	"	"	"	"	"	U
2,6-dinitrotoluene	ND	80	"	"	"	"	"	"	U
acenaphthene	276	80	"	"	"	"	"	"	
3-nitroaniline	ND	80	"	"	"	"	"	"	U
2,4-dinitrophenol	ND	160	"	"	"	"	"	"	U
dibenzofuran	471	80	"	"	"	"	"	"	
2,4-dinitrotoluene	ND	80	"	"	"	"	"	"	U
4-nitrophenol	ND	160	"	"	"	"	"	"	U
fluorene	453	80	"	"	"	"	"	"	
4-Chlorophenyl phenyl ether	ND	80	"	"	"	"	"	"	U

Waste Stream Technology

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Tonawanda Coke Corporation
3875 River Road
Tonawanda NY, 14150

Project: Misc
Project Number: Tonawanda Coke - RP1355
Project Manager: Mark Kamholz

Reported:
05/28/10 15:01

Semivolatile Organic Compounds by EPA Method 8270C
Waste Stream Technology

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
CS1A-6F - Oil (0E13002-06) Oil Sampled: 05/07/10 11:02 Received: 05/07/10 13:52									
Diethyl phthalate	ND	80	mg/kg	20	AE02101	05/21/10	05/25/10	EPA 8270C	U
4-nitroaniline	ND	80	"	"	"	"	"	"	U
4,6-Dinitro-2-methylphenol	ND	160	"	"	"	"	"	"	U
n-nitrosodiphenylamine	ND	80	"	"	"	"	"	"	U
4-bromophenylphenylether	ND	80	"	"	"	"	"	"	U
hexachlorobenzene	ND	80	"	"	"	"	"	"	U
pentachlorophenol	ND	160	"	"	"	"	"	"	U
phenanthrene	1370	80	"	"	"	"	"	"	
anthracene	242	80	"	"	"	"	"	"	
carbazole	ND	80	"	"	"	"	"	"	U
Di-n-butyl phthalate	ND	80	"	"	"	"	"	"	U
benzidine	ND	400	"	"	"	"	"	"	U
fluoranthene	824	80	"	"	"	"	"	"	
3,3'-Dichlorobenzidine	ND	80	"	"	"	"	"	"	U
pyrene	736	80	"	"	"	"	"	"	
Butyl benzyl phthalate	ND	80	"	"	"	"	"	"	U
Benzo (a) anthracene	263	80	"	"	"	"	"	"	
chrysene	200	80	"	"	"	"	"	"	
bis(2-ethylhexyl)phthalate	ND	80	"	"	"	"	"	"	U
Di-n-octyl phthalate	ND	80	"	"	"	"	"	"	U
Benzo (b) fluoranthene	278	80	"	"	"	"	"	"	
Benzo (k) fluoranthene	ND	80	"	"	"	"	"	"	U
Benzo (a) pyrene	200	80	"	"	"	"	"	"	
Indeno (1,2,3-cd) pyrene	122	80	"	"	"	"	"	"	
Dibenz (a,h) anthracene	ND	80	"	"	"	"	"	"	U
Benzo (g,h,i) perylene	123	80	"	"	"	"	"	"	
Surrogate: 2-Fluorophenol	67.3 %	59-101			"	"	"	"	
Surrogate: Phenol-d6	77.4 %	64-105			"	"	"	"	
Surrogate: Nitrobenzene-d5	95.6 %	58-105			"	"	"	"	
Surrogate: 2-Fluorobiphenyl	91.8 %	67-101			"	"	"	"	
Surrogate: 2,4,6-Tribromophenol	89.9 %	63-108			"	"	"	"	
Surrogate: Terphenyl-d14	105 %	38-133			"	"	"	"	

Waste Stream Technology

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Tonawanda Coke Corporation
3875 River Road
Tonawanda NY, 14150

Project: Misc
Project Number: Tonawanda Coke - RP1355
Project Manager: Mark Kamholz

Reported:
05/28/10 15:01

Physical Parameters by APHA/ASTM/EPA Methods
Waste Stream Technology

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
CS1A-4F - Water (0E13002-01) Water Sampled: 05/07/10 10:55 Received: 05/07/10 13:52									
Ignitability by Flashpoint	135		deg F	1	AE01416	05/14/10	05/14/10	EPA 1010	
CS1A-4F - Oil (0E13002-02) Oil Sampled: 05/07/10 10:55 Received: 05/07/10 13:52									
Ignitability by Flashpoint	153		deg F	1	AE01415	05/13/10	05/13/10	EPA 1010	
CS1A-5F - Water (0E13002-03) Water Sampled: 05/07/10 10:59 Received: 05/07/10 13:52									
Ignitability by Flashpoint	129		deg F	1	AE01416	05/14/10	05/14/10	EPA 1010	
CS1A-5F - Oil (0E13002-04) Oil Sampled: 05/07/10 10:59 Received: 05/07/10 13:52									
Ignitability by Flashpoint	129		deg F	1	AE01415	05/13/10	05/13/10	EPA 1010	
CS1A-6F - Water (0E13002-05) Water Sampled: 05/07/10 11:02 Received: 05/07/10 13:52									
Ignitability by Flashpoint	135		deg F	1	AE01416	05/14/10	05/14/10	EPA 1010	
CS1A-6F - Oil (0E13002-06) Oil Sampled: 05/07/10 11:02 Received: 05/07/10 13:52									
Ignitability by Flashpoint	165		deg F	1	AE01415	05/13/10	05/13/10	EPA 1010	

Waste Stream Technology

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Tonawanda Coke Corporation
3875 River Road
Tonawanda NY, 14150

Project: Misc
Project Number: Tonawanda Coke - RP1355
Project Manager: Mark Kamholz

Reported:
05/28/10 15:01

Notes and Definitions

U Analyte included in the analysis, but not detected at or above the reporting limit.

S-04 The surrogate recovery for this sample is outside of established control limits due to a sample matrix effect

S-01 The surrogate recovery for this sample is not available due to sample dilution required from high analyte concentration and/or matrix interferences.

D This flag assigned to compounds identified in an analysis at a secondary dilution factor.

B Analyte is found in the associated blank as well as in the sample (CLP B-flag).

DET Analyte DETECTED

ND Analyte NOT DETECTED at or above the reporting limit

NR Not Reported

dry Sample results reported on a dry weight basis

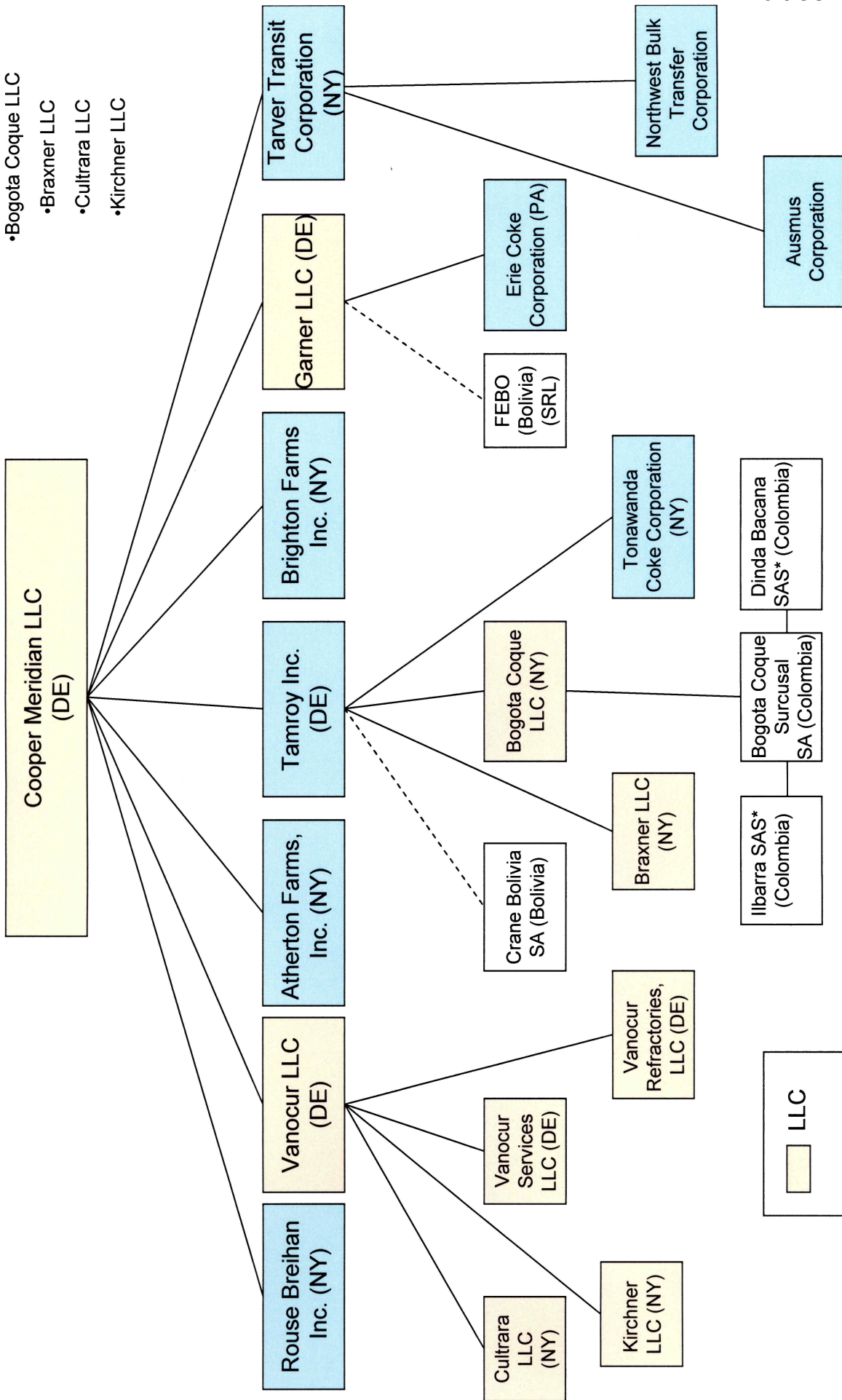
RPD Relative Percent Difference

Crane Companies

Post-Reorganization

As of January 1, 2007

- Denotes Shareholders of the Simple Anonymous Society as:
- Dolinger Deisel LLC
- Bogota Coque LLC
- Braxner LLC
- Cultrara LLC
- Kirchner LLC



IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,
and

COMMONWEALTH OF
PENNSYLVANIA, DEPARTMENT
OF ENVIRONMENTAL
PROTECTION,

Plaintiffs,

v.

ERIE COKE CORPORATION,

Defendant.

CIVIL ACTION NO.:

COMPLAINT

The United States of America, by and through its attorneys, by authority of the Attorney General of the United States and acting at the request and on behalf of the Administrator of the United States Environmental Protection Agency ("U.S. EPA"), and the Commonwealth of Pennsylvania, Department of Environmental Protection ("PADEP") (collectively "Plaintiffs") allege the following:

NATURE OF ACTION

1. This is a civil action brought against Erie Coke Corporation ("Defendant" or "Erie Coke") for injunctive relief and the assessment of civil penalties for violations of the Clean Air Act ("CAA" or "Act"), 42 U.S.C. §§ 7401 to 7671q, implementing regulations and the Pennsylvania State Implementation Plan ("SIP"). The alleged violations occurred and are

occurring at Erie Coke's coke production facilities located in Erie County, Pennsylvania (hereafter the "Erie Coke Facility" or "Facility").

JURISDICTION AND VENUE

2. This Court has jurisdiction over the subject matter of this action pursuant to CAA Section 113(b), 42 U.S.C. § 7413(b), and 28 U.S.C. §§ 1331, 1345 and 1355.

3. Venue is proper in this district pursuant to CAA Section 113(b), 42 U.S.C. § 7413(b), and 28 U.S.C. §§ 1391(b) and 1395(a) because the violations of the Act giving rise to this claim occurred in this district and Defendant does business and is found in this district.

NOTICES

4. Pursuant to CAA Section 113(a), 42 U.S.C. § 7413(a), U.S. EPA and/or PADEP notified Erie Coke of the violations of the Pennsylvania SIP and Title V Permit alleged in this Complaint on: June 19, 2008; August 22, 2008; August 28, 2008; October 17, 2008; November 21, 2008; December 4, 2008; December 11, 2008; December 16, 2008; February 5, 2009; February, 9, 2009; March 16, 2009; April 29, 2009; April 30, 2009; May 1, 2009; May 5, 2009; May 6, 2009; May 11, 2009; and May 15, 2009.

5. In addition, pursuant to 42 U.S.C. § 7604(a), PADEP provided notice on June 5, 2009 via certified mail, return receipt requested, to Erie Coke and relevant federal officials of PADEP's intent to file an action against Erie Coke for violations of the Pennsylvania SIP and Title V Permit at the Erie Coke Facility should the violations not be addressed. More than 60 days has past since this notice was sent.

AUTHORITY

6. Authority to bring this action is vested in the Attorney General of the United States pursuant to 28 U.S.C. §§ 516 and 519 and 42 U.S.C. § 7605, and the Office of General Counsel of the Commonwealth of Pennsylvania pursuant to § 71 P.S. §§ 732-301 and 732-402. The Commonwealth of Pennsylvania intervenes with the United States in this action pursuant to 42 U.S.C. § 7604.

DEFENDANT

7. Defendant Erie Coke Corporation ("Erie Coke") is a corporation organized under the laws of the Commonwealth of Pennsylvania.

8. Erie Coke is a "person" as defined in CAA Section 302(e), 42 U.S.C. § 7602(e).

9. The Erie Coke Facility is located on East Avenue in the city of Erie, Erie County, Pennsylvania. The Facility includes two coke oven batteries comprised of numerous coke ovens for the production of foundry coke. These ovens are heated by combusting coke oven gas in flues. The combustion by-products are emitted from the batteries through a single combustion stack.

10. Coke at the plant is produced from coal. Coal is charged into hot ovens and all the volatile matter in the coal is driven off as coke oven gas. Once the charge is complete, the oven ports are sealed and the coal is heated using cleaned coke oven gas to approximately 2,100 degrees Fahrenheit for about 33 hours. Volatile compounds are driven from the coal and sent to the by-products recovery section of the plant. At the end of the heating cycle for each oven, the front and rear doors are removed and the coke is pushed into a rail quench car. The quench car takes the coke to the quench tower where the hot coke is cooled with water. The coke is then

screened and sent off site. Coke is used as a carbon source and as a fuel to heat and melt iron ore at steel making facilities.

STATUTORY AND REGULATORY BACKGROUND

11. The Clean Air Act establishes a regulatory scheme designed to protect and enhance the quality of the nation's air so as to promote the public health and welfare and the productive capacity of its population. CAA Section 101(b)(1); 42 U.S.C. § 7401(b)(1).

12. Section 109(a) of the Act, 42 U.S.C. § 7409(a), requires the Administrator of U.S. EPA to publish and maintain primary and secondary national ambient air quality standards ("NAAQS") for certain criteria air pollutants. The primary NAAQS are to be adequate to protect the public health, and the secondary NAAQS are to be adequate to protect the public welfare, from any known or anticipated adverse effects associated with the presence of the air pollutant in the ambient air. The NAAQS promulgated by U.S. EPA pursuant to this provision are set forth in 40 C.F.R. Part 50.

13. Under CAA Section 110, 42 U.S.C. § 7410, each state is required to adopt and submit to U.S. EPA for approval a State Implementation Plan (SIP) that provides for the implementation, maintenance and enforcement of NAAQS established under CAA Section 109 within the States. Upon U.S. EPA's approval, State plan provisions become part of the "applicable implementation plan" for the State within the meaning of CAA Section 302(q), 42 U.S.C. § 7602(q). U.S. EPA approved Pennsylvania's SIP. *See* 40 C.F.R. § 52.2020(b). These regulations are hereafter referred to as the "Pennsylvania SIP" or "PSIP".

14. Pursuant to CAA Section 110, 42 U.S.C. § 7410, Pennsylvania adopted various regulations as part of its SIP, including: limits on visible emission opacity from combustion

sources, such as coke ovens, 25 Pa. Code § 123.41; limits on visible emission opacity from pushing operations at coke oven batteries, 25 Pa. Code § 129.15(c); and requirements for operating permit monitoring, recordkeeping, and reporting conditions, 25 Pa. Code §127.441(c).

15. Pursuant to 25 Pa. Code § 123.41: "A person may not permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following: (1) Equal to or greater than 20% for a period or periods aggregating more than 3 minutes in any 1 hour. (2) Equal to or greater than 60% at any time."

16. Pursuant to 25 Pa. Code § 129.15(c): "Visible fugitive air contaminants in excess of 20% opacity from an air cleaning device installed for the control of pushing emissions under a plan approval from [PADEP] shall be prohibited"

17. Pushing emissions are fugitive emissions. Both federal and SIP regulations contain required procedures to quantify the magnitude of such emissions through opacity readings conducted by properly certified individuals to ensure compliance with the opacity limits above. The SIP standards rely on Method 9 to evaluate visible emission opacity. 40 C.F.R. Part 60, Appendix A; 25 Pa. Code §123.43.

18. Pursuant to 25 Pa. Code §127.441(c): "The operating permit shall incorporate the monitoring, recordkeeping and reporting requirements required by Chapter 139 (relating to sampling and testing) and other monitoring, recordkeeping or reporting requirements ..."

19. Title V of the CAA, 42 U.S.C. §§ 7661-7661f, mandates a federally enforceable operating permit program for certain sources, which states may be approved to implement.

20. U.S. EPA approved the incorporation of the Pennsylvania Title V operating permit program into the Pennsylvania SIP on August 29, 1996. 61 FR 39597.

21. The Pennsylvania regulations implementing Pennsylvania's Title V operating permit program are promulgated at 25 Pa. Code §§ 127.401-127.464.

22. Section 502(a) of the Act, 42 U.S.C. § 7661a(a), provides that it is unlawful for any person to violate any requirement of a permit issued under Title V of the Act after the effective date of any permit program approved under Title V of the CAA.

23. Plaintiff PADEP issued a Title V permit for the Erie Coke Facility, No. TV-25-00029, on August 1, 2006 ("Title V Permit").

24. The Title V Permit incorporates the limit on visible emission opacity from pushing operations at coke oven batteries, 25 Pa. Code § 129.15, and the general limit on visible emission opacity from combustion sources, 25 Pa. Code § 123.41.

25. The Title V Permit incorporates annual testing requirements for each of the Boilers to determine the NOx emissions from the Boilers.

26. The Title V Permit requires that the permitted facility comply with the terms and conditions of the Title V Permit and that noncompliance with the permit constitutes a violation of the Act and the Pennsylvania Air Pollution Control Act and is grounds for an enforcement action.

27. The Pennsylvania SIP, 25 Pa. Code § 127.25, provides: "[a] person may not cause or permit the operation of a source subject to § 127.11 (construction plan approval) unless the source and air cleaning devices identified in the application for the plan approval and the plan approval issued to the source, are operated and maintained in accordance with specifications in the application and conditions in the plan approval issued by [PADEP]. A person may not cause or permit the operation of an air contamination source subject to this chapter in a manner

inconsistent with good operating practices.” This provision is incorporated by reference into Defendant’s Permit.

28. The Pennsylvania SIP, 25 Pa. Code § 127.402, provides: “[a] person may not operate a stationary air contamination source unless [PADEP] has issued to the person a permit to operate the source under this article in response to a written application for a permit submitted on forms and containing the information the Department may prescribe”

29. The Pennsylvania SIP, 25 Pa. Code § 127.444, provides: “[a] person may not cause or permit the operation of a source subject to this article [relating to operating permit requirements] unless the source and air cleaning devices identified in the application for the plan approval and operating permit and the plan approval issued to the source are operated and maintained in accordance with specifications in the application and conditions in the plan approval and operating permit issued by [PADEP]. A person may not cause or permit the operation of an air contamination source subject to this chapter in a manner inconsistent with good operating practices.” This provision is incorporated by reference in Defendant’s Title V Permit.

Enforcement Provisions

30. Section 113(b) of the Clean Air Act, 42 U.S.C. § 7413(b)(1), authorizes EPA to initiate a judicial enforcement action for a permanent or temporary injunction, and/or for a civil penalty against any person whenever such person has violated, or is in violation of, any requirement or prohibition of an applicable implementation plan or permit. Section 113(b)(2), 42 U.S.C. § 7413(b)(2), authorizes EPA to initiate a judicial enforcement action for a permanent or temporary injunction, and/or for a civil penalty against any person whenever such person has

violated, or is violation of, requirements of the Clean Air Act other than those specified in Section 113(b)(1).

31. Pursuant to CAA Section 113(a) and (b), 42 U.S.C. § 7413(a) and (b), SIP requirements that U.S. EPA has approved are federally enforceable.

32. Failure to comply with any approved regulatory provision of a SIP renders the person or the governmental entity subject to enforcement action under CAA Section 113, 42 U.S.C. § 7413 and 40 C.F.R. § 52.23.

33. Pursuant to 40 C.F.R. § 52.23, “[f]ailure to comply with any . . . permit condition . . . issued pursuant to approved or promulgated regulations for the review of new or modified stationary . . . sources, or with any permit limitation or condition . . . , shall render the person or governmental entity so failing to comply in violation of a requirement of an applicable implementation plan and subject to enforcement action under Section 113 of the CAA.”

34. Section 113(b) of the Act, 42 U.S.C. § 7413(b), authorizes the Administrator to initiate a judicial enforcement action for a permanent or temporary injunction, and/or for a civil penalty of up to \$32,500 per day for each violation occurring on or after March 15, 2004, and \$37,500 per day for each such violation occurring on or after January 12, 2009. In addition, Section 304 of the Act, 42 U.S.C. § 7604, authorizes the Commonwealth of Pennsylvania to initiate a judicial enforcement action or intervene in an action commenced by the Administrator.

35. The Erie Coke Facility is a major air pollution source operating in Pennsylvania and subject to the Pennsylvania SIP.

FIRST CLAIM FOR RELIEF

Stack Emissions

25 Pa. Code § 123.41

36. The allegations of Paragraphs 1 through 35 are incorporated herein by reference.

37. Between May 7, 2008 and May 13, 2009, EPA and/or PADEP conducted numerous inspections of the emission sources at the Facility. EPA and/or PADEP documented visible emission opacity equal to or greater than 20% opacity and/or 60 % opacity from the combustion (Battery and/or Boiler) stack as follows:

20% opacity , time period 1:47 pm to 2:47 pm, May 7, 2008, 8.25 minutes;
 20% opacity, time period 2:47 pm to 3:47 pm, May 7, 2008, 16 minutes;
 20% opacity, time period 8:35 am to 9:35 am, May 8, 2008, 28.5 minutes;
 20% opacity, time period 10:35 am to 11:35 am, May 8, 2008, 10 minutes;
 20% opacity, time period 2:25 pm to 3:35 pm, May 8, 2008, 31.25 minutes;
 20% opacity, time period 10:08 am to 10:28am, August 21, 2008, 10 minutes;
 60% opacity, time period 10:08am to 10:28am, August 21, 2008, 8.25 minutes;
 20% opacity, time period 1:15pm to 1:35pm, August 27, 2008, 5.75 minutes;
 60% opacity, time period 1:15pm to 1:35pm, August 27, 2008, 12.5 minutes;
 20% opacity, time period 11:02 am to 11:42am, December 2, 2008, 14.5 minutes;
 20% opacity, time period 11:52 am to 12:26pm, December 10, 2008, 6.5 minutes;
 20% opacity, time period 10:19 am to 11:19 am, December 11, 2008, 3.5 minutes;
 20% opacity, time period 12:46 pm to 1:10 pm, January 31, 2009, 9.75 minutes;
 20% opacity, time period 12:47pm to 1:07pm, February 1, 2009, 11.0 minutes;
 20% opacity, time period 12:36pm to 1:06pm, February 7, 2009, 6.75 minutes;
 60% opacity, time period 12:36pm to 1:06pm, February 7, 2009, 1.75 minutes;
 20% opacity, time period 9:54 am to 10 54am, February 8, 2009, 5.5 minutes;
 20% opacity, time period 3:03pm to 3:30pm, March 4, 2009, 6.45 minutes;
 20% opacity, timer period 10:15am to 11:14am, March 5, 2009, 10.25 minutes;
 20% opacity, time period 2:30 pm to 3:15pm, March 5, 2009, 9.75 minutes;
 20% opacity, time period 10:04am to 11:04 am, March 6, 2009, 7.5 minutes;
 20% opacity, time period 11:08am to 11:24am, March 6, 2009, 5.75 minutes;
 60% opacity, time period 11:08am to 11:24am, March 6, 2009, .25 minutes;
 20% opacity, time period 12:09pm to 12:28 am, March 6, 2009, 5.5 minutes;
 20% opacity, time period 11:15am to 11:45am, March 7, 2009, 30.5 minutes;
 20% opacity, time period 4:00pm to 5:00pm, March 10, 2009, 5.25 minutes;
 20% opacity, time period 3:32pm to 3:42pm, April 27, 2009, 3.5 minutes;
 20% opacity, time period 5:10pm to 6:10pm, April 28, 2009, 3.25minutes;
 60% opacity, time period 5:10pm to 6:10pm, April 28, 2009, 3.75 minutes;

20% opacity, time period 6:19pm to 7:19pm, April 29, 2009, 16.0 minutes; and
20% opacity, time period 1:42pm to 2:22pm, May 1, 2009, 26.75 minutes;

38. Erie Coke violated and continues to violate 25 Pa. Code § 123.41, which establishes a visible emission opacity limit on the combustion stack of 20% for a period or periods aggregating more than three (3) minutes in any one (1) hour or a visible emission opacity limit on the combustion stack equal to or greater than 60% at any time.

39. Pursuant to CAA Section 113(b), 42 U.S.C. § 7413(b), for each violation referred to in the preceding paragraphs, Erie Coke is subject to injunctive relief and civil penalties of up to \$32,500 per day for each violation occurring on or after March 15, 2004, and \$37,500 per day for each violation occurring on or after January 12, 2009.

SECOND CLAIM FOR RELIEF

Pushing Emissions 25 Pa. Code 129.15(c)

40. Paragraphs 1 through 35 above are re-alleged as if fully set forth herein.

41. Between May 7, 2008 and May 13, 2009, EPA and/or PADEP conducted numerous inspections of the emission sources at the Facility. EPA and/or PADEP documented visible emission opacity in excess of 20% opacity from pushing operations on the following days:

May 8, 2008;
September 26, 2008;
September 30, 2008;
March 6, 2009;
March 8 2009;
March 10, 2009;
March 12, 2009;
May 7, 2009; and
May 13, 2009.

42. Each exceedence of the SIP limit on visible emission opacity limit for pushing operations is a violation of 25 Pa. Code 129.15(c).

43. Erie Coke violated and continues to violate 25 Pa. Code § 129.15(c), which establishes a visible emission opacity limit on pushing emissions of 20% for any period .

44. Pursuant to CAA Section 113(b), 42 U.S.C. § 7413(b), for each violation referred to in the preceding paragraph, Erie Coke is subject to injunctive relief and civil penalties of up to \$32,500 per day for each violation occurring on or after March 15, 2004 and \$37,500 per day for each violation occurring on or after January 12, 2009.

THIRD CLAIM FOR RELIEF
Improper Operation and Maintenance
25 Pa. Code § 127.25

45. Paragraphs 1 through 35 above are re-alleged as if fully set forth herein.

46. The Pennsylvania SIP, 25 Pa. Code § 127.25, provides that an operator shall not cause or permit the operation of a source in a manner "inconsistent with good operating practices."

47. Proper maintenance of coke ovens and associated equipment is essential to avoid excess emissions from equipment including: coke oven doors, jambs, buckstays, tie rods, flues, standpipes, and stacks. Equipment maintenance is also essential to prevent excess emissions from activities conducted for each oven in use on a daily basis such as charging, pushing, quenching and soaking.

48. Erie Coke has not maintained its coke ovens in a condition that would minimize emissions as required by the Pennsylvania SIP.

49. Many ovens at the Facility are in poor condition. These ovens likely generate more fugitive emissions because they do not work properly and should be repaired. Operating these ovens in this condition is not consistent with the requirement to employ good operating practices. Therefore, Erie Coke has operated and continues to operate in violation of 25 Pa. Code 127.25.

50. Pursuant to CAA Section 113(b), 42 U.S.C. § 7413(b), for each violation referred to in the preceding paragraphs, Erie Coke is subject to injunctive relief and civil penalties of up to \$32,500 per day for each violation occurring on or after March 15, 2004 and \$37,500 per day for each violation occurring on or after January 12, 2009.

FOURTH CLAIM FOR RELIEF

Emission Testing

Title V Permit

51. The allegations of Paragraphs 1 through 35 are incorporated herein by reference.

52. On September 26, 2008 and September 30, 2008, the PADEP conducted an inspection of the Facility. PADEP documented that no annual stack test for NOx emissions from Boiler #1 had been conducted since December 1999 and that no annual stack test for NOx emissions from Boiler #2 had been conducted since October 2003.

53. Every day since December 1999 that the stack for Boiler #1 has not been tested for NOx emissions is a violation of Erie Coke's Title V Permit.

54. Every day since October 2003 that the stack for Boiler #2 has not been tested for NOx emissions is a violation of 25 Pa. Code §127.444.

55. Erie Coke violated and continues to violate 25 Pa. Code §127.444, which requires Erie Coke to comply with the annual emission testing requirement for NO_x for each of the Boilers set forth in its Title V Permit.

56. Pursuant to CAA Section 113(b), 42 U.S.C. § 7413(b), for each violation referred to in the preceding paragraph, Erie Coke is subject to injunctive relief and civil penalties of up to \$32,500 per day for each violation occurring on or after March 15, 2004 and \$37,500 per day for each violation occurring on or after January 12, 2009.

FIFTH CLAIM FOR RELIEF
Other Title V Permit Violations

57. Paragraphs 1 through 56 above are re-alleged as if fully set forth herein.

58. Pursuant to the SIP, 25 Pa. Code § 127.444, it is illegal to operate a permitted source in violation of any condition of its Title V Permit requirements.

59. The Title V Permit for the Facility, No TV-25-00029, incorporates by reference Pennsylvania SIP requirements including 25 Pa. Code §§ 123.41, 127.25, and 129.15(c).

60. Each violation of 25 Pa. Code §§ 123.41, 127.25, and 129.15(c), is a violation of the Title V Permit enforceable pursuant to 25 Pa. Code § 127.444 and 42 U.S.C. § 7661a(a).

61. Pursuant to CAA Section 113(b), 42 U.S.C. § 7413(b), for each violation referred to in the preceding paragraphs, Erie Coke is subject to injunctive relief and civil penalties of up to \$32,500 per day for each violation occurring on or after March 15, 2004, and \$37,500 per day for each violation occurring on or after January 12, 2009.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs, the United States of America, and the Commonwealth of Pennsylvania respectfully request that this Court:

A. Permanently enjoin Defendant from further violations of the CAA and applicable requirements established thereunder, including provisions of the Pennsylvania SIP described above;

B. Require Defendant to obtain and comply with all necessary permits and to undertake and complete expeditiously all actions necessary to achieve and maintain compliance with the CAA and applicable requirements established thereunder, including provisions of the Pennsylvania SIP described above;

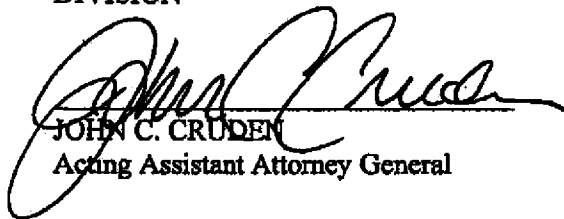
C. Assess civil penalties against Defendant for violations of applicable provisions of the CAA as well as their implementing regulations and permits issued thereunder of up to \$32,500 per day of violation occurring on or after March 15, 2004 and \$37,500 per day of violation occurring on or after January 12, 2009;

D. Award Plaintiffs their costs and disbursements for this action; and

E. Grant Plaintiffs such other relief as the Court may deem just and proper.

Respectfully submitted,

UNITED STATES DEPARTMENT OF JUSTICE
ENVIRONMENT AND NATURAL RESOURCES
DIVISION


JOHN C. CRUDEN
Acting Assistant Attorney General

Environment and Natural Resources Division
U.S. Department of Justice



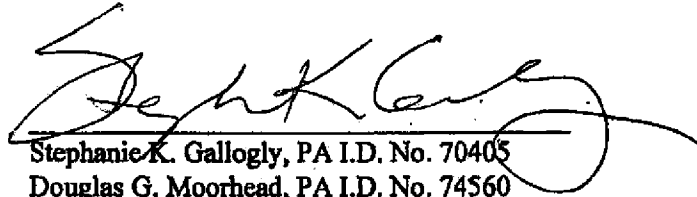
ELLIOT M. ROCKLER
Trial Attorney
Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Washington, D.C. 20044-7611
(202) 514-2653
elliott.rockler@usdoj.gov

MARY BETH BUCHANAN
United States Attorney
Western District of Pennsylvania

By: s/Paul E. Skirtich
PAUL E. SKIRTICH
Assistant U.S. Attorney
U.S. Post Office & Courthouse
700 Grant Street, Suite 4000
Pittsburgh, PA 15219
(412) 894-7418
PA ID No. 30440

OF COUNSEL:
DANIEL BOEHMCKE
Senior Assistant Regional Counsel
United States Environmental
Protection Agency-Region 3
1650 Arch Street
Philadelphia, Pennsylvania 19103

COMMONWEALTH OF PENNSYLVANIA,
DEPARTMENT OF ENVIRONMENTAL PROTECTION



Stephanie K. Gallogly, PA I.D. No. 70405

Douglas G. Moorhead, PA I.D. No. 74560

Assistant Counsel

Northwest Regional Counsel

230 Chestnut Street

Meadville, PA 16335-3418

Phone: 814-332-6070

Facsimile: 814-332-6996

E-mail: sgallogly@state.pa.us

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

United States of America and Commonwealth of Pennsylvania,
Department of Environmental Protection

(b) County of Residence of First Listed Plaintiff _____

(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

Paul E. Skirtich, AUSA
700 Grant Street, Suite 4000
Pittsburgh, PA 15219 (412) 894-7418

DEFENDANTS

Erie Coke Corporation

County of Residence of First Listed Defendant Erie

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE
LAND INVOLVED.

Attorneys (If Known)

None/Unknown

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☒ 1 U.S. Government Plaintiff ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|--|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated <i>or</i> Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated <i>and</i> Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input checked="" type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 449 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition		

V. ORIGIN

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation ☐ 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Violations of the Clean Air Act, 42 U.S.C. §§ 7401 to 7671g

Brief description of cause:

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☒ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE _____

DOCKET NUMBER _____

DATE

9-22-09

SIGNATURE OF ATTORNEY OF RECORD

s/Paul E. Skirtich, Assistant U.S. Attorney

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

JS 44AREVISED OCTOBER, 1993

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

THIS CASE DESIGNATION SHEET MUST BE COMPLETED

PART A

This case belongs on the (☒ Erie _____ Johnstown _____ Pittsburgh) calendar.

1. ERIE CALENDAR - If cause of action arose in the counties of Crawford, Elk, Erie, Forest, McKean, Venang or Warren, OR any plaintiff or defendant resides in one of said counties.
2. JOHNSTOWN CALENDAR - If cause of action arose in the counties of Bedford, Blair, Cambria, Clearfield or Somerset OR any plaintiff or defendant resides in one of said counties.
3. Complete if on ERIE CALENDAR: I certify that the cause of action arose in Erie County and that the coke production facilities are located in Erie County.
4. Complete if on JOHNSTOWN CALENDAR: I certify that the cause of action arose in _____ County and that the _____ resides in _____ County.

PART B (You are to check ONE of the following)

1. _____ This case is related to Number _____ Judge _____.
2. ☒ This case is not related to a pending or terminated case.

DEFINITIONS OF RELATED CASES:

CIVIL: Civil cases are deemed related when a case filed relates to property included in another suit or involves the same issues of fact or it grows out of the same transactions as another suit or involves the validity or infringement of a patent involved in another suit

EMINENT DOMAIN: Cases in contiguous closely located groups and in common ownership groups which will lend themselves to consolidation for trial shall be deemed related.

HABEAS CORPUS & CIVIL RIGHTS: All habeas corpus petitions filed by the same individual shall be deemed related. All pro se Civil Rights actions by the same individual shall be deemed related.

PART C

1. CIVIL CATEGORY (Place x in only applicable category).

1. () Antitrust and Securities Act Cases
2. () Labor-Management Relations
3. () Habeas Corpus
4. () Civil Rights
5. () Patent, Copyright, and Trademark
6. () Eminent Domain
7. (x) All other federal question cases
8. () All personal and property damage tort cases, including maritime, FELA, Jones Act, Motor vehicle, products liability, assault, defamation, malicious prosecution, and false arrest
9. () Insurance indemnity, contract and other diversity cases.
10. () Government Collection Cases (shall include HEW Student Loans (Education), VA Overpayment, Overpayment of Social Security, Enlistment Overpayment (Army, Navy, etc.), HUD Loans, GAO Loans (Misc. Types), Mortgage Foreclosures, S.B.4. Loans, Civil Penalties and Coal Mine Penalty and Reclamation Fees.)

I certify that to the best of my knowledge the entries on this Case Designation Sheet are true and correct

Date: 9-22-09s/Paul E. Skirtich

ATTORNEY AT LAW

NOTE: ALL SECTIONS OF BOTH SIDES MUST BE COMPLETED BEFORE CASE CAN BE PROCESSED.

3555.01
GOVERNMENT
EXHIBIT
1:10-cr-00219

New York State Department of Environmental Conservation
Division of Law Enforcement
NARRATIVE REPORT

Case Number: 09-018924	Case Name: Tonawanda Coke Corporation
Title and Name: Investigator Robert E. O'Connor	Date: April 13, 2010
Subject/purpose: To report proffer interview with Gerald Priamo	

On Monday, March 22, 2010, Gerald Priamo came to the United States Attorney's Office in Buffalo and participated in a proffer interview. Present were AUSA Aaron Mango, EPA CID Special Agent Robert Conway, Mr. Priamo's Counsel, Patrick Brown, and his secretary Jeanine Alexander. USDOJ Attorney Kevin Cassidy participated in the proffer via conference call, and I was also in attendance.

The meeting began with a brief discussion among the attorneys outside the presence of Mr. Priamo. Mr. Priamo entered and AUSA Mango went over the proffer letter with him.

Mr. Priamo stated that he began work at the facility when it was still Allied Chemical. He told us he worked for about three years, prior to a "big fire"; he said he worked in coke handling as an hourly employee. He told us he was laid off after the fire and was hired by J.D. Crane in February 1978, around the time Crane bought Allied Chemical, as an hourly worker. He told us he was hourly for about two years. He said he became a general foreman and was on the battery for the next three years. He said he became the battery supervisor after that.

Mr. Priamo said he traveled for TCC in the 1980's. He said he went to Detroit, Saint Louis, and then Erie for special projects. Priamo said he came back to TCC and was still the battery supervisor. He told us that in 2000 he traveled quite a bit. He said Crane was starting to make modules for coke ovens. He said his travel was related to that. He said he went to Indianapolis Coke in 2000 (not owned by Crane – now closed). After that trip he returned to the battery at TCC.

Subsequently, Mr. Priamo said he was dispatched to Sloss Coke, in Alabama, in the early 1980's. He said he went back to Indianapolis Coke in 2002. He said that in 2002 and 2003 he was sent back to Erie Coke to supervise oven repairs there. He told us that in the fall of 2003 he received a call to return to Erie Coke. He said he went and returned for the holidays that year and then Bob Bloom asked him to become the Plant Superintendent at Erie Coke in February of 2004.

In February of 2005, he said he was either going to quit or be terminated if he didn't return to Tonawanda. He said he came home in March of 2005. He said there was a big job that needed to be done by May. Mr. Priamo told us that he was hurt in an accident at work when a cement mixer fell on his foot. He told us that he broke several bones and was in a fiberglass cast for five weeks. After that he was in a boot cast. He told us that Don Crane

wanted him back to work and he went back. Mr. Priamo told us he became the Plant Superintendent at TCC in September of 2005.

In the spring of 2006, Priamo was ordered to return to Sloss Coke, in Alabama, he said. He told us he went and then returned to Tonawanda. He said he then went back to Sloss in September of 2006. Priamo told us that Dan Heukrath was the Assistant Plant Superintendent at TCC at that time.

Mr. Priamo told us that he went to a coke plant in South Africa in November of 2006. He said he was accompanied by Bob Bloom and by Dan Heukrath. He told us that when the three returned in December, 2006, Dan Heukrath was made Superintendent. He told us that John Rodgers was in charge at TCC while they were gone.

Priamo told us that Don Crane sent him to Crane's coke oven brick manufacturing company, Vanocur, to watch the process and told Priamo that he would be traveling again. Priamo said that Bob Bloom wanted him back at Erie Coke in February of 2007. He said he went and was there all summer but was back and forth a few times. He said he went back to TCC in 2008 as the battery supervisor.

Priamo told us he went to the Netherlands with Bob Kolvek in June of 2008, returning in August, 2008. He said he was only at TCC for a few days and was then sent to Hamilton, Ontario to do a "triple wall" there. He said he returned to TCC in September of 2008.

Mr. Priamo also recounted several other trips he took for TCC. He said he was gone from November 1, 2007, until Thanksgiving, to A.K. Steel in Middletown, Ohio; in November 2008, for a week, also to A.K. Steel, to supervise a job there, and once again for a week in November of 2008, each time coming back to the battery at TCC. Mr. Priamo said that he went back to Erie Coke in the fall of 2009 but returned to TCC and is currently a battery supervisor there.

As a battery supervisor, Priamo said he supervised Anthony Brossack and Frankie Gonzalez. He said the battery produced two types of coke. He said they were furnace and foundry coke. He said that furnace coke was generally smaller than foundry coke. He said that there were many sizes produced including 1x4, 6x9, 4x9, 4x6, and 3x4. He said however, that it was the chemistry, rather than the size that really determines if a particular coke was furnace or foundry. He said that sometimes the name of a particular coke is derived from the name of the TCC customer that buys that particular coke. He said that furnace coke has a faster scheduled coking time, usually 18- 22 or 24 hours. He said that foundry coke remains in the ovens for 30 to 40 hours and as much as 48 hours. He also said, however, that furnace and foundry coke might be pushed in the same number of hours.

Mr. Priamo was shown a document (a pushing schedule) and he explained it. It included columns titled Door Number, Time Charged, Time Pushed, Coking Time and Amps. He said that amps indicated the amount of power it took to push the coke out of the oven. He said if the amps were over 500, the push was considered a 'sticker'. He said Erie Coke had a lot of problems with 'stickers', but that Tonawanda didn't have too many problems with them. He said 'stickers' happen when batteries' walls are shot.

The discussion turned toward the subject of coal tar sludge. Mr. Priamo was shown a photo of the coal tar sludge bin in the bi-products area. He identified it as such and said it was located along "Broadway" behind the by-products area on the pushed side of the battery. He said end loader operators pick up the coal tar sludge from the hopper with the end loaders and transport the sludge to the coal fields. He said the sludge was mixed with the coal in the fields on the ground. He said that John Rogers, Dan Heukrath and Dave Dahl were the TCC employees who would have been in charge of directing the emptying of the sludge in the bin.

Mr. Priamo looked at an aerial view of the facility and pointed out a feature he called the number seven belt. He said that the belt divided the two types of coal storage piles at the plant; he said the two types were high volatility and low volatility. He said that the coal tar sludge from the by-products was mixed with these piles of coal. Priamo also said that coal tar sludge also came from off site and was mixed into the coal piles on the ground, as opposed to on what was known as the coal tar pad, a paved area with short side walls. He said that he thought the sources of the coal tar sludge from offsite were the former Bethlehem Steel, from Detroit, and from a company called Empire Coke in Indianapolis, IN. He told us that the only people at TCC that would know for sure were John Rogers and Mark Kamholz. He said that the sludge that was not produced at TCC came in on semi-dump trailers. Mr. Priamo said the trailers would come in, get weighed on the scale, and go to the coal tar pad. Priamo said he observed Kamholz watch the trailers dump at the pad at least a few times.

Priamo told us that Purvis Jones was one of the end loader operators who transported the TCC produced sludge from the by-products area to the coal fields. He told us he hadn't observed Jones distribute the sludge into the piles on the ground, but heard that that was the way in which it was done.

Priamo said that Ron Snyder used to be a coal handling supervisor. He said that when Snyder was supervisor there was a piece of equipment called a plug mill. He told us the plug mill operator would put coal tar sludge and coal into the mill which fed a belt that would deliver the mixture to the coal handling area of the plant. Priamo said that operation didn't work very well, as the coal/coal tar sludge mixture was often contaminated with debris, which would cause the mill to not operate correctly. He said the offsite sludge that came in was contaminated with debris. He told us that when the mill didn't work, the sludge would be deposited directly onto the coal piles. He said that was standard operating procedure. He said the results of mixing the sludge into the piles was noticeable even if you didn't see it being done. He said he saw the results. Priamo said that, with respect to the TCC produced coal tar sludge, the coal tar bin in the by-products area would be emptied about once a day when production was up.

The discussion turned toward the subject of the coal tar sludge tanks at TCC that were involved in a fire. Mr. Priamo said that he was on one of his many out-of-town assignments when the area around the coal tar sludge tanks caught fire, and so he wasn't at TCC when it occurred. Mr. Priamo told us about an incident that he said occurred about ten to twelve years ago. The incident illustrated the condition of a set of tanks, which contained coal tar sludge, was in. He told us that he was an amateur wildlife photographer. He said there were frequently deer, including large bucks on the TCC property. He said that he had been

watching one deer with a large set of antlers. He said one side of the rack was typical and one side was non-typical. He said an end loader, he didn't remember who, told him about a deer that was dead and looked as if it had become trapped in some sludge that had leaked out of one of the storage tanks. Priamo said he thought the deer might have been one he had been keeping an eye on, and said he went to investigate.

He said he found a dead deer laying in coal tar sludge near the tanks. He said it looked as though it may have become stuck in the sludge and died trying to get out. He said it was on its side and that the level of sludge on the ground covered about half of its body. Priamo said that he told Mark Kamholz about the deer and the sludge on the ground. He said he also told Tony Brossack and John Rogers about it. He said he went to the site with Mark Kamholz, to show him. Priamo said that the solution to remedy the situation was to put coke breeze on the coal tar sludge. Mr. Priamo indicated the area where this incident occurred on a drawing of the facility. He said the storage tanks looked like "Swiss cheese" due to the multiple holes in the sides of the tanks.

Mr. Priamo said that when he returned from one of his work related trips, he was told about the fire. He said he was told about it by Tony Brossack and Frankie Gonzalez. He told us that after the fire, but before the regulatory inspection last April ('09), he observed John Rogers using an excavator to scoop out coal tar sludge from the ruins of the tank. He said that as far as he knew, Mark Kamholz had directed the excavating of the sludge. He said that Rogers told him (Priamo) that Kamholz had directed him (Rogers) to do so. Priamo was asked if there was a new policy at TCC regarding where the coal tar sludge is placed. Specifically, he was asked if it was now the policy to use the paved pad with short sidewalls or if the sludge was still to be mixed into the coal piles on the ground. Priamo responded that he didn't know. Priamo said that the area of the ruined tanks was now flagged off with caution tape.

The discussion turned toward the presence of baffles in the quenching towers. Mr. Priamo identified the western tower, the one closer to the river as tower number 1. He identified the other tower, the eastern one, as tower number two. He said that tower number 1 had been out of service since a long time ago. He said that there hadn't been baffles in it and that it had been used in emergencies. He told us that Mark Kamholz had told him (Priamo) that the quenching equipment were called quenching stations, not quenching towers. He said that Kamholz further explained to him that only one of the stations required baffles. Priamo told us that Erie Coke only has one quenching station. Mr. Priamo said that right after number two station was modified, that is lowered, Kamholz told him that it didn't need baffles any more. He said he didn't question Kamholz; he said that Kamholz is the environmental guy and that he has the last word on environmental issues.

Mr. Priamo said that with respect to which of the two stations were to be used, the hot car operator is told which one to use. He said that the number 2 station is the one that was "always" used. He said number 1 was only used when the hot car operator was specifically told to use it. He added that the number 1 station had been out of service for a long time. Priamo said that John Rogers or Steve McCormick made the call as to which station was to be used. He told us that sometimes he (Priamo) would receive the direction from one of them and pass on the direction by radio to the hot car operator. He told us that the number 1 station

was used about once per shift in the winter to keep it from freezing. Priamo told us that the number 1 station was put back in regular service about 2 years ago in the fall. He said that now number 1 is used more often. Kevin Cassidy wanted Mr. Priamo to clarify if it was an increase in production that affected a more frequent use of the number 1 station. Priamo didn't know why John Rogers ordered more quenches at number 1. Priamo said that Rogers would just say something like "I need a few quenches at number 1."

Mr. Priamo said that the number 2 station was down at one point. He told us that when it was, he would send hot car operators to the number 1 station without any direction from John Rogers. He said that sometimes Rogers would direct the use of the number 1 station even when the number 2 station was operational. He told us he would relay the order through the radio sometimes. Mr. Priamo told us that the baffles in the stations are needed to control fugitive emissions. He said that prior to reducing the height of the number 2 station in 1996, there was a system in place to flush the baffles.

The discussion turned toward railroad tank cars on a railroad siding on the south side of the TCC property. Priamo said that in 2008, prior to his trip to the Netherlands, TCC hired Steve McCormick. He told us that he observed McCormick and Dan Heukrath with a generator. He told us that he asked McCormick what they were doing with the generator. He said McCormick told him that he (McCormick) and Heukrath were unloading material out of one of the tank cars and putting it into the bulk density oil storage tank. Priamo told us that he advised McCormick against participating in that job for safety reasons. Priamo said that McCormick responded, saying that Mark Kamholz had told him (McCormick) that he (Kamholz) had had it tested. Priamo told us that he had never questioned Heukrath about the incident.

Mr. Priamo made a remark that he didn't trust Mark Kamholz. When he was asked why, gave us several reasons. He mentioned the incident with the railroad tank cars discussed earlier in this report. He also told us about the following incident:

Priamo said that a valve had been put in a bleeder stack to bleed off excess coke oven gas during periods of high production and in the summertime when the boiler didn't require as much coke oven gas. Priamo said that about 15 to 20 years ago, he asked Kamholz about the valve and if it should be lit if there was gas coming out. Priamo said that Kamholz told him, "No, don't worry about it." Priamo said that the failure to bleed off the excess gas could affect the exhausters. Priamo continued with explaining the incident and why he didn't trust Kamholz. He said that last April, during a regulatory inspection at TCC, Pat Cahill told Priamo that a regulator discovered the valve and asked Kamholz about it. He said that Cahill told him (Priamo) that Kamholz acted as if he didn't know about the valve and asked Cahill something like, "How long has this been going on?" Priamo said that Cahill told him about what had happened and he said that Tony Brossack was also present when Cahill told of what had happened. Priamo said that he knew Kamholz knew about the valve, and had known for 15 to 20 years, yet he pretended to regulators that he didn't know anything about it. Priamo said that a few weeks prior to this proffer interview, the valve was rendered inoperative. The gas was rerouted to another area of the plant, and now vents through a valve with a flare. He said the flare was lit almost all the time.

Priamo told us about another reason he said he didn't trust Kamholz. He said Kamholz told him that he had the igniter removed from a flare stack on the battery because the natural gas required to operate it was too expensive. Priamo told us he thought the igniter was required for safety and environmental reasons. Priamo told us that DEC inspector Larry Sitzman discovered that the igniter was not operating and cited TCC for it.

Mr. Priamo cited yet another reason for his mistrust. According to Priamo, Kamholz said he (Kamholz) was going to get locked up, as the result of an incident at TCC with electrical transformers containing PCB oil. Priamo said Kamholz told him (Priamo) that he (Kamholz) had to sweet talk his way out of an incident with two DEC Officers. Priamo said that either Gene Wilkowski or John Rogers, he said he didn't remember which, said that Tony Brossack said that PCB oil was spread on the coal in the coal fields. Priamo said that he believed this was true because John Rogers also told him (Priamo) that he (Rogers) knew who spread the PCB oil, but didn't say who it was.

Priamo said that Frankie Gonzalez was telling some others about his Grand Jury testimony. Gonzalez said he was asked about the refractory silica brick and where it ended up. Gonzalez said he testified that John Rogers took care of it, and found out that the brick was a regulated waste. Priamo said that Rogers told him (Priamo) that, "I put them in the front berm." Priamo said that when he asked Rogers about it a second time, Rogers denied knowing anything about where the brick ended up. He told us that this second time was about three weeks before this proffer. He said the brick was generated from an oven replacement job done in 2006.

Priamo began to discuss the issue of back pressure on the coke oven gas collector main. He said the pressure was set at about 5-7 mm, at most. He said he went to Erie Coke in '07, and that a person named Tom Birmingham, the plant manager at the former Bethlehem Steel, was brought in to TCC as a supposed expert. Priamo said that Birmingham wanted the collector main back pressure set at 10 mm. Priamo said that when he returned to TCC, the pressure was manipulated to 5mm for the 303 inspections. Priamo said that when he returned, two TCC foremen, John Bowen and Pete Dolan, weren't insuring that the oven door gaskets and frames were being properly cleaned. Priamo explained that the lack of proper door gasket and frame maintenance leads to increased leaks. There leaks would cause TCC to fail the 303 inspections. He explained that if the back pressure was manipulated downward, which it was, this would compensate for the lack of maintenance on the gaskets and frames, allowing TCC a greater chance of passing the inspections. Priamo said both Bowen and Dolan are no longer employed at TCC.

Priamo said he went on a Trip to Empire, a coke plant in Alabama, with J.D. Crane. He said that while on that trip, he had a conversation with Crane about 303 inspections. Priamo said that Crane made a remark about going to jail if you don't do 303 inspections. When back at TCC, Priamo said he caught an inspector named Brian Hawke not doing a 303 inspection properly. Priamo said Hawke admitted to him that he didn't do the inspection of the doors properly. He said this incident was in '07 or more recently. Priamo said that Mark Kibler and Carl Horne were the co-owners of the company TCC contracts with to do the 303 inspections.

Priamo said Kolvek and McCormick were attempting to increase production from 8 pushes to 48 pushes a day. He said the reason for the attempted increase in production was a large order that TCC had received from US Steel for furnace coke. He said he told Kamholz that that kind of production couldn't be done.

Priamo said that a contractor named Bernie McDonald was killed on the quench tracks in the 80's. He said he heard something about ammonia and the number one quench station, but he wasn't sure about it. He said he didn't know about any waste buried on site. He said there hadn't been many dirty pushes lately, but there were 'bombs' every day when they were doing furnace coke. He said TCC had a no camera policy. He said he didn't know where the bulk density oil came from. He said he knew of Junior Parks, also known as 'Georgie Boy', but didn't know where he lived. He said the same about Joe Biserell.

Priamo said that his pay was cut by \$12,000 per year when he gave up the superintendent duties. He told us that John Rogers was close with J.D. Crane's daughter, Colleen. He said Rogers talked to Colleen every day. Priamo said that Mark Kamholz has a cabin in the country, around Ashford Hollow.

Priamo said that Mark Kamholz asked him (Priamo) to sign in a notebook that he (Priamo) hadn't seen fugitive emissions, when he had, in fact, seen fugitive emissions. Priamo said that Kamholz made him sign daily monitoring reports and told us that he (Priamo) had no clue what they were. He told us he didn't take any discharge readings, but was told by Kamholz that it was part of his job to sign the reports; he said Kamholz said it was all legal. He told us he also signed DMR's in Erie.

Priamo told us that Kamholz's sons, who run a landscaping business, do the landscaping at TCC. He said that TCC got rid of a less expensive company to employ Mark's sons.

Mr. Priamo said that in 2007, while he was at Erie Coke, a Pennsylvania DEP Official named Bill Dunigan watched the stack until he observed a violation. He said that Dunigan went to Security and issued the Plant Manager a citation for the violation. He said that another time Dunigan issued a citation to Kamholz, Kamholz crumpled up the citation, threw it at Dunigan, said it was "bull shit" and went home. Priamo also said that on a different occasion, Kamholz got into an argument about whether a push was a dirty push. He told us that Kamholz shoved Dunigan, and that Dunigan fell to the ground. He said Kamholz claimed that Dunigan tripped on a piece of coke.

Priamo was shown an organizational chart of companies owned by Crane. He identified some of the companies he knew about. END OF REPORT.

AFS
1/31/06

CERTIFICATION OF TRUTH, ACCURACY AND COMPLETENESS

Report Type: Annual Reporting Period: 1-1-05 To 12-31-05

DECID: 9-1464-00113/00031

Facility Name: Tonawanda Coke Corporation

Address: 3875 River Road

Tonawanda

New York 14150

FACILITY CONTACT:

Name: Mark L. Kamholz

Title: Manager-Environment Control

Telephone: 716 876-6222

RESPONSIBLE OFFICIAL:

Name: Gerald A. Priamo

Title: Plant Manager

Address: 3875 River Road

Tonawanda

New York 14150

Telephone: 716 876-6222

The Responsible Official must sign this statement after the applicable report form is completed.
I certify, under penalty of law, that based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

Signature of Responsible Official: *Gerald A. Priamo*

Date: 1/10/06

file: titlevc

RECEIVED
Region 9- Div. of Air

JAN 12 2006

N.Y.S. DEPT. OF
ENVIRONMENTAL CONSERVATION

031
GOVERNMENT
EXHIBIT
1:10-cr-00219

TCC-00138003

031-0001

ANNUAL MONITORING REPORT

TONAWANDA COKE CORPORATION

Condition Number	Application Requirement	Permit Level	Description of Requirement	Compliance Status Continuous or Intermittent	Method Used to Determine Compliance	Deviation Y/N
1	200.5	Facility	Sealing of Equipment	Continuous	Inspection	N
2	200.6	Facility	Maintain Ambient Air Quality	Continuous	Allows Commissioner To Require Controls When Contravention Occures	N
3	200.7	Facility	Maintenance of Equipment	Continuous	Make Required Repairs	N
4	201-1.2	Facility	Unpermitted Sources	Continuous	Apply For Permit To Operate	N
5	201-1.5	Facility	Emergency Defence	Continuous	Report Provisions	N
6	201-1.7	Facility	Recycle And Salvage	Continuous	Administrative	N
7	201-1.8	Facility	Prohibit Reintroduction of Collected Contaminants Into The Air	Continuous	Administrative	N
8	201-1.10(b)	Facility	Public Access to Title V Records	Continuous	Administrative	N
9	201-3.2(a)	Facility	Proof of Eligibility	Continuous	Recordkeeping	N
10	201-3.3(a)	Facility	Proof of Eligibility-Trivial Source	Continuous	Recordkeeping	N
11	201-6	Facility	Criteria, Limits, Terms, Conditions, and Standards	Continuous	Reporting-Certification	N
12	201-6	Facility	Cessation or Reduction of Permitted Activity Not a Defence	Continuous	Administrative	N
13	201-6	Facility	Compliance Requirements	Continuous	Format of Compliance Reporting	N
14	201-6	Facility	Federally Enforceable Requirements	Continuous	Administrative	N
15	201-6	Facility	Fees	Continuous	Pay Fees	N
16	201-6	Facility	Monitoring, Recordkeeping, Reporting	Continuous	Administrative	N
17	201-6	Facility	Revocation, Modification, Reopening, Reissuance or Termination	Continuous	Administrative	N
18	201-6	Facility	Permit Shield	Continuous	Administrative	N
19	201-6	Facility	Property Rights	Continuous	No Conveyance of Property Rights or Any Exculsive Privilege	N
20	201-6	Facility	Reopening For Cause	Continuous	Specific Requirement for Reopening of Permit	N

ANNUAL MONITORING REPORT

TONAWANDA COKE CORPORATION

Condition Number	Application Requirement	Permit Level	Description of Requirement	Compliance Status Continuous or Intermittent	Method Used to Determine Compliance	Deviation Y/N
21	201-6	Facility	Right To Inspect	Continuous	Allow Authorized Personnel Access To Facility and Records	N
22	201-6	Facility	Severability	Continuous	Administrative	N
23	201-6	Facility	Emission Unit Definition	Continuous	Identify Emission Units of Facility	N
24	201-6.5(e)	Facility	Reporting - Annual	Continuous	File Report with Agency	N
25	201-6.5(c)(3)(ii)	Facility	Reporting - Semi Annual	Continuous	File Report with Agency	N
26	201-6.5(g)	Facility	Permit Exclusion Provision	Continuous	Administrative	N
27	202-1.1	Facility	Required Emission Tests	Continuous	Submit Acceptable Report	N
28	202-2.1	Facility	Compliance Certification of Emission Statement	Continuous	Submit Emission Statement by April 15 of Each Year	N
29	202-2.5	Facility	Keep Records for at Least 5 Years	Continuous	Administrative - Keep Records for at Least 5 Years	N
30	211.3	Facility	Visible Emission Limit on Permitted Open Burning	Continuous	Observe Opacity	N
31	215	Facility	Open Fire Prohibition	Continuous	No Open Burning	N
32	40 CFR 82 Subpart F	Facility	Recycling Emission Reduction From MVAC Appliances	Continuous	Use Certified Technicians	N
33	201-6	Facility	Emission Definition by Emission Unit	Continuous	Describe Emission By Emission Unit	N
34	201.6	Facility	Process Definition by Emission Unit	Continuous	Describe Process By Emission Unit	N
35	227-1.3(a)	EUL	Opacity Limit	Continuous	Method 9	N
36	227-2.4(e)(1)(iii)	EUL	RACT Analysis	Continuous	Report Submitted	N
37	227-2.4(d)	EUL	Tune-up On Boiler 2	Continuous	Did Not Operate	N
38	227-2.4(d)	EUL	Tune-up On Boiler 3	Continuous	Did Not Operate	N
39	227-2.4(c)(1)(iii)	EUL	Compliance Plan for Mid Sized Boiler	Continuous	Follow Plan	N
40	227-2.4(d)	EUL	Tune-up On Boiler 2	Continuous	Did Not Operate	N

ANNUAL MONITORING REPORT**TONAWANDA COKE CORPORATION**Pg 3 of 6

Condition Number	Application Requirement	Permit Level	Description of Requirement	Compliance Status Continuous or Intermittent	Method Used to Determine Compliance	Deviation Y/N
41	227-2.4(d)	EUL	Tune-up on Boiler 3	Continuous	Did Not Operate	N
42	40 CFR 61.130(a) Subpart L	EUL	Applicability to Defined Equipment	Continuous	Administrative	N
43	40 CFR 61.130(a) Subpart L	EUL	Defines Certain Equipment at Foundry Plants for Performance Standards	Continuous	Make Required Equipment Modification and Perform Testing	N
44	40 CFR 61.132(b) Subpart L	EUL	Leak Detection	Continuous	Method 21	N
45	40 CFR 61.132.(c) Subpart L	EUL	Record Keeping Maintenance Procedures	Continuous	Inspection	N
46	40 CFR 61.135(a) Subpart L	EUL	Equipment in Benzene Service	Continuous	Determine if Equipment is in Benzene Service	N
47	40 CFR 61.135(a) Subpart L	EUL	Exceptions to Subpart V Requirements	Continuous	Subpart V is not Applicable	N
48	40 CFR 61.135(c) Subpart L	EUL	Labeling of Equipment in Benzene Service	Continuous	Label Equipment That is in Benzene Service	N
49	40 CFR 61.135(c) Subpart L	EUL	Requirement for Foundry Plant to Remain a Foundry Plant	Continuous	Monitor Production and Coke Time on an Annual Basis	N
50	40 CFR 61.138(a) Subpart L	EUL	Recordkeeping Requirements	Continuous	Records Kept	N
51	40 CFR 61.138(f) Subpart L	EUL	Leak Detection Report	Continuous	Method 21-Submit Report	N
52	40 CFR 61.135(d) Subpart L	EUL	Leak Detection Report	Continuous	Method 21-Submit Report	N
53	40 CFR 61.242-1 Subpart V	EUL	Labeling of Equipment	Continuous	Equipment Labeled	N
54	40 CFR 61.242-10 Subpart V	EUL	Delay of Repair Requirements	Continuous	Meet Requirements if Delayed	N
55	40 CFR 61.245(b) Subpart V	EUL	Monitoring Requirements	Continuous	Method 21-Submit Report	N
56	40 CFR 61.246(b) Subpart V	EUL	Leak Detection Report	Continuous	Method 21-Submit Report	N
57	40 CFR 61.246(c) Subpart V	EUL	Leak Detection Report	Continuous	Method 21-Submit Report	N
58	40 CFR 61.246(e) Subpart V	EUL	Leak Detection Report	Continuous	Method 21-Submit Report	N
59	40 CFR 61.247 Subpart V	EUL	Recordkeeping - Reporting	Continuous	Semi-Annual Report Submitted	N
60	40 CFR 61.242-6 Subpart V	EUL	Standards for Open Ended Valves and Lines	Continuous	Meet Standards	N

ANNUAL MONITORING REPORT

TONAWANDA COKE CORPORATION

Condition Number	Application Requirement	Permit Level	Description of Requirement	Compliance Status Continuous or Intermittent	Method Used to Determine Compliance	Deviation Y/N
61	40 CFR 61.242-8 Subpart V	EUL	Leak Detection Report	Continuous	Method 21- Submit Report	N
62	40 CFR 61.242-2 (a)(1) Subpart V	EUL	Leak Detection Report	Continuous	Method 21- Submit Report	N
63	40 CFR 61.242-2 (a)(2) Subpart V	EUL	Leak Detection	Continuous	Visual - Submit Report	N
64	40 CFR 61.242-7 (a) Subpart V	EUL	Leak Detection Report	Continuous	Method 21 - Submit Report	N
65	40 CFR 61.246(f) Subpart V	EUL	Recordkeeping	Continuous	Submit Report	N
66	212.6(a)	EUL	Opacity Limit	Continuous	Method 9 - Weekly Observations	N
67	40 CFR 63.306(a) Subpart L	EUL	Work Practice Plan Development	Continuous	Work Practice Plan in Place	N
68	40 CFR 63.306(c) (2) Subpart L	EUL	Implement Provisions of Work Practice Plan	Continuous	Monitor Visible Emissions	N
69	40 CFR 63.306(d) Subpart L	EUL	Work Practice Plan Revision	Continuous	Administrative	N
70	40 CFR 63.307(a) (2) Subpart L	EUL	Bypass/Bleeder Stack Venting	Continuous	Venting Only Through Flare System	N
71	40 CFR 63.307(b) Subpart L	EUL	Bypass/Bleeder Stack Requirements	Continuous	Flare Installed	N
72	40 CFR 63.307(c) Subpart L	EUL	Compliance Certification-Venting	Continuous	Submit Report	N
73	40 CFR 63.308 Subpart L	EUL	Compliance Certification-Collector Main	Continuous	Method 303	N
74	40 CFR 63.309 Subpart L	EUL	Performance Test and Procedures	Continuous	Recordkeeping	N
75	40 CFR 63.310 Subpart L	EUL	Requirements for Start-up, Shutdown, and Malfunction	Continuous	Start-up, Shutdown, and Malfunction Plan in Place	N
76	40 CFR 63.311(d) Subpart L	EUL	Compliance Certification	Continuous	Submit Report	N
77	40 CFR 63.311(e) Subpart L	EUL	Compliance Certification	Continuous	As Required	N
78	40 CFR 63.311(f) Subpart L	EUL	Recordkeeping	Continuous	Keep Records as Required	N
79	40 CFR 63.311(g) Subpart L	EUL	Records Availability to Union	Continuous	Records are Available to Union	N
80	40 CFR 312 Subpart L	EUL	Existing Regulations and Requirements	Continuous	Administrative	N

ANNUAL MONITORING REPORT**TONAWANDA COKE CORPORATION**Pg 5 of 6

Condition Number	Application Requirement	Permit Level	Description of Requirement	Compliance Status Continuous or Intermittent	Method Used to Determine Compliance	Deviation Y/N
81	214.3	EUL	Coal Charging Limit	Continuous	Administrative	N
82	214.10(b)	EUL	Compliance Certification	Continuous	Method 303 Data	N
83	40 CFR 302(a) (1) Subpart L	EUL	Compliance Certification - Charging	Continuous	Method 303	N
84	214.7	EUL	Leaking Door Limit	Continuous	Administrative	N
85	214.7(c)	EUL	Oven Door Maintenance	Continuous	Method 303 Data	N
86	214.7(d)	EUL	Work Practice and Maintenance Plan	Continuous	Administrative	N
87	214.10(b)	EUL	Compliance Certification - Doors	Continuous	Method 303 Data	N
88	40 CFR 63.302(a) (1)(i)(B) Subpart L	EUL	Compliance Certification - Doors	Continuous	Method 303	N
89	40 CFR 63.302(a) (2)(ii) Subpart L	EUL	Compliance Certification - Door After 1-1-03	Continuous	Method 303	N
90	214.8(a)	EUL	Compliance Certification - Lids	Continuous	Method 303 Data	N
91	214.8(b)	EUL	Offtake Piping Leaks	Continuous	Method 303 Data	N
92	40 CFR 63.302(a) (1)(ii) Subpart L	EUL	Compliance Certification Lids	Continuous	Method 303	N
93	214.10(b)	EUL	Compliance Certification - Offtake Piping	Continuous	Method 303 Data	N
94	40 CFR 63.302(a) (1)(iii) Subpart L	EUL	Compliance Certification - Offtake Piping	Continuous	Method 303	N
95	214.4	EUL	Alternate Plan	Continuous	Method 303 Data	N
96	214.5	EUL	Compliance Certification - Quench Tower	Continuous	Testing	N
97	214.5	EUL	Compliance Certification - Quench Tower	Continuous	Testing	N
98	214.6	EUL	Compliance Certification - Stack	Continuous	Weekly Opacity Observations	Y
99	214.6	EUL	Compliance Certification - Stack	Continuous	3-Hour Block Opacity Observation	N
100	214.9(b)	EUL	NOx RACT Battery Heating	Continuous	Approved Plan	N

ANNUAL MONITORING REPORT

TONAWANDA COKE CORPORATION

Pg 6 of 6

[illegible]

TONAWANDA COKE CORPORATION

Pg_ / of _

[illegible]

→ this is a
reference to this
report.
There is no other
written notification

TCC-00138010
031-0008